

ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

**Budawang SSD, 17 Croobyar Rd,
Milton, NSW**

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Aboriginal Groups

- Barraby Cultural Services
- Clive Freeman
- Guunamaa Dreamin Sites and Surveying
- Leanne Tungai
- Minnamunnung
- Paul McLeod (South Coast People)
- Tungai Tonghi
- Ulladulla Local Aboriginal Land Council
- Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation
- Yurrandaali Cultural Services

Client

- Schools Infrastructure NSW

Abbreviations

ACHA	Aboriginal Cultural Heritage Assessment
ACHAR	Aboriginal Cultural Heritage Assessment Report
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
Cm	Centimetre
The Code	<i>The Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> (DECCW 2010b)
DEC	Department of Environment and Conservation
DECC	Department of Environment and Climate Change
DECCW	Department of Environment, Climate Change and Water
DP	Deposited Plan
EPA	Environment Planning and Assessment
ICOMOS	International Council on Monuments and Sites
km	Kilometre
LALC	Local Aboriginal Land Council
LCC	Liverpool City Council
LEP	Local Environmental Plan
LGA	Local Government Area
m	Metre
mm	Millimetre
NHL	National Heritage List
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPWS	National Parks and Wildlife Service



NSW	New South Wales
NTSCORP	Native Title Services Corporation
OEH	NSW Office of Environment and Heritage
PAD	Potential Archaeological Deposit
The Project	Proposed development within Project Area
RAPs	Registered Aboriginal Parties

Executive Summary

The proponent, Schools Infrastructure NSW is preparing a development application for the development of new premises for the relocation of the Budawang SSP school from Ulladulla to Milton. The new school will be located on the site of the former Anglican School at Croobyar Road in Milton, NSW (the study area). The proposed development is considered state significant development and the application under the Planning Secretaries Environmental Requirements is SD-8845345. The environmental assessment requirements include the completion of an Aboriginal Cultural Heritage Assessment Report (ACHAR).

Tocomwall Pty Ltd have been engaged to complete Aboriginal Cultural Heritage Assessment and report. The Aboriginal Cultural Heritage Assessment of the study area has been carried out in consultation with the registered Aboriginal stakeholders for the project. The assessment identified two areas remaining within the study area that have the potential to retain undisturbed soil profiles and these areas were predicted to contain a disperse low density artefact scatter consistent with the archaeology of the South Coast of NSW, taking into consideration the topography, distance to water, significant landscape features, the knowledge of the traditional owners and registered Aboriginal parties, and the results of previous studies carried out within the locality. One of these areas is located within the proposed development footprint. A test excavation methodology was designed and implemented to test for the presence of Aboriginal objects within this location. Two lithic artefacts were identified during the test excavation program. An assessment of the significance of the site and the lithic artefacts concluded that they are of low scientific significance. The proposed development will impact upon the site where the artefacts were identified and the immediate surrounding undisturbed area which potentially contains intact soils and may contain Aboriginal objects. As part of the SSD review process these impacts to the Aboriginal heritage will be reviewed. The outcomes of this review process should continue in consultation with the registered Aboriginal stakeholders.

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1 Introduction

1.1 Project Background

The proponent, Schools Infrastructure NSW is preparing a development application for the development of new premises for the relocation of the Budawang school from Ulladulla to Milton. The new school will be located on the site of the former Anglican School at Croobyar Road in Milton, NSW.

The proposed development is considered state significant development and the application under the Planning Secretaries Environmental Requirements is SSD-8845345. The environmental assessment requirements include the completion of an Aboriginal Cultural Heritage Assessment Report (ACHAR).

Tocomwall Pty Ltd have been engaged by Schools Infrastructure NSW (SINSW) to undertake an Aboriginal Cultural Heritage Assessment in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010*. This methodology has been prepared in accordance with the requirements of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, 2010*. This will assist in the event an application for an AHIP is required, and will assist the Department of Planning, Industry and Environment (DPIE), now Heritage NSW in consideration and determination of the application.

1.2 Investigation Contributors

This report is prepared by William Moon MA Archaeology and Heritage Management, GCPJM, Dip PJM. William has 12 years of experience working in the heritage industry, with 5 years of experience as an archaeologist. He has 17 years of experience in the recording of Aboriginal archaeological sites. The investigation was undertaken by William Moon and Danielle Mitchell. Danielle has a Bachelor of Science from Macquarie University, majoring in Geology, Palaeobiology, Ancient Mediterranean Cultures. Graduate Diploma in Archaeology and Heritage Management from Flinders University, Adelaide, SA. She has 16 years experience working as an archaeologist.

1.3 Location and Proposed Development

The proposed development of the Budawang SSP is located at Lot 200 in D.P. 1192140. It is the site of the former Anglican school at Croobyar Road in Milton, NSW, close to the intersection of Croobyar Road with the Princes Highway. The site has been used for educational purposes since at least the early 1990s when the Croobyar Christian School opened. After closure of the Croobyar School the site was acquired by the Shoalhaven Anglican School, who further expanded the facilities, with the most recent buildings on site being constructed as recently as 2015 (Group GSA 2020). Figure 1 to Figure 4 show the layout

of the existing buildings within the study area, buildable areas within the site, and the location and proposed arrangement for the Budawang SSP.



Figure 1: Layout of existing buildings within the study area (Group GSA 2020).



Figure 2: Locations considered as buildable areas within the study area (Group GSA 2020).

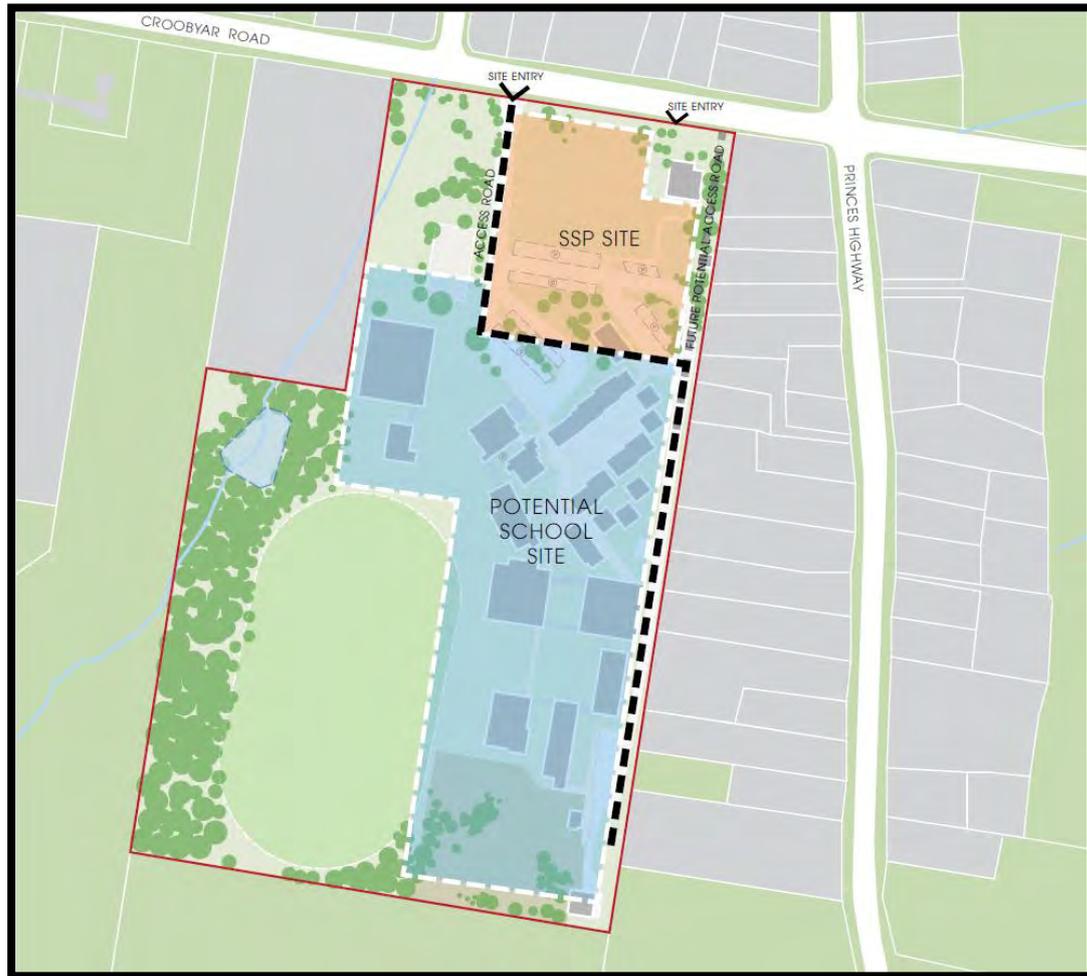


Figure 3: Budawang SSP site location (Group GSA 2020).



Figure 4: Masterplan option showing the locations of new buildings (Group GSA 2020).

The objectives of the development are to address the need for Special Purposes school accommodation in the Milton Ulladulla locality. The Budawang SSP concept design report prepared by Groups GSA (2020) describes this need as follows:

‘The existing Budawang School for Special Purposes is currently located on Camden Street in Ulladulla within buildings it has occupied since the 1980s. The entry criteria for students to Budawang SSP is an assessment of moderate to severe intellectual disability. Typically, this is coupled with other disabilities, conditions or requirements, such as a sensory condition, autism, behavioural and/or emotional disorders, and/or severe physical disabilities. It is notable that the percentage of special needs within the entire school population for the South Coast of NSW is currently approximately 6%, which is notably higher than the NSW average.

The Camden Street Budawang SSP site is leased by the NSW Department of Education, for the purpose of a Special Needs School, however the current lease expires in December 2021. Existing facilities provide 5 homebases, which the Principal of Budawang states is inadequate compared to the number of students currently on the waiting list for enrolment at the school. Additionally, as the school has already been expanded by placement of demountable classrooms on the site, core facilities are inadequate for the current size of the school and there is insufficient outdoor space for learning and play. The existing buildings, particularly the core facilities, are in poor condition and have been assessed as being not fit for

purpose. As the site is leased and is now too small to offer the required provision, relocation of Budawang SSP is necessary.'

1.4 Planning approvals

The planning controls under the Planning Secretary's Environmental Assessment Requirements include:

- Section 4.12(8) of the Environmental Planning and Assessment Act 1979
- Schedule 2 of the Environmental Planning and Assessment Regulation 2000

1.5 Statutory Heritage Contexts and Controls

Two primary pieces of legislation provide automatic statutory protection for Aboriginal heritage and the requirements for its management in New South Wales. These are:

- The National Parks and Wildlife Act 1974 (NPW Act); and
- The Environmental Planning and Assessment Act 1979.

1.5.1 National Parks and Wildlife Act 1974

The primary legislation for the protection of Aboriginal culture and heritage in NSW is the *NPW Act*. One of the key objectives stated in the *NPW Act* is:

'..... the conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including but not limited to: (i) places, objects and features of significance to Aboriginal people.... [s.2A (1) (6)].'

The *NPW Act* defines Aboriginal Heritage as comprising 'Aboriginal objects' and 'Aboriginal Places'. Aboriginal heritage is defined as:

- An object under the *NPW Act* is defined as '*any deposit, or object or material evidence relating to the Aboriginal habitation of the area*' (Section 5 of the *NPW Act*); and
- An Aboriginal Place is defined as '*a place that is or was of special significance with respect to Aboriginal culture*' (Section 84 of the *NPW Act*).

Part 6 of the *NPW Act* provides specific protection for Aboriginal objects and declared Aboriginal Places by establishing offences of harm. Harm is defined as '*..destroying, defacing or damaging an Aboriginal object or place, or moving an object from the land.*' There are fines associated with causing harm to an Aboriginal object. However, there are exemptions for causing harm, for example the preparation of an Aboriginal Heritage Impact Permit (AHIP). For State Significant Development refer to Environmental Planning and Assessment ACT 1979 Section 4.41(d).

Heritage NSW is the current government agency with responsibility for the protection and management of Aboriginal archaeological sites and cultural heritage values and the statutory administration of the NPW Act.

1.5.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EPA Act) establishes the statutory planning framework for environmental and land use planning in NSW through *State Environmental Planning Policies* (SEPPs), *Regional Environmental Plans* (REPs) and *Local Environmental Plans* (LEPs).

The EPA Act also establishes the framework for Aboriginal heritage values to be formally assessed in land use planning and development consent processes. The requirements for the project are defined in the Planning Secretary's Environmental Assessment requirements for application number SSD-10445.

1.5.3 Native Title Act 1993

The Native Title Act 1993 provides the legal framework to recognition and protection of native title. It includes the recognition of the traditional rights and interests to land and waters of Aboriginal and Torres Strait Islander people. Under the Native Title Act, native title claimants can make an application to the Federal Court to have their native title recognised by Australian law. As part of the consultation process for the project it was confirmed that the registered native title claimants for the area are the South Coast People.

1.5.4 Reporting Standards and Guidelines

This report has been prepared in accordance with the following heritage recording, assessment and reporting guidelines and standards that are endorsed by the OEH:

- Australia ICOMOS. 2013. The Burra Charter. The Australia ICOMOS Charter for Places of Cultural Significance. Australia ICOMOS Inc.¹
- NSW Department of Environment, Climate Change & Water. (DECCW) 2010a. Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. DECCW. Sydney.
- NSW Department of Environment, Climate Change & Water. (DECCW) 2010b (September). Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales. DECCW. Sydney.
- NSW Department of Environment, Climate Change & Water. 2010c Aboriginal cultural heritage consultation requirements for proponents 2010.
- DECCW. 2011 Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW.

¹ The Burra Charter establishes nationally accepted principles for the conservation of places of cultural significance.

1.6 State Heritage Register

A search of the NSW State Heritage Register, Australian Heritage Database and the Shoalhaven has revealed that there are no heritage items listed within the study area.

2 Methodology

The following defines the proposed methodology for the Aboriginal Cultural Heritage Assessment (ACHA) as a requirement of the Planning Secretary's Environmental Assessment Requirements for the Budawang SSP development. The ACHA will be carried out in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010, Aboriginal cultural heritage consultation requirements for proponents 2010, the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011 and for State Significant Development refer to Environmental Planning and Assessment ACT 1979 Section 4.41(d). The methodology is depicted in Figure 5: ACHA Methodology. The Steps are described in more detail in Table 1.

Step	Method
1: Initiate Consultation Process	The consultation process is initiated in accordance with Aboriginal cultural heritage consultation requirements for proponents 2010.
2: Review previous archaeological work	Review previous archaeological work in accordance with the requirements of Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010. The review of previous archaeological work is defined in section 4.2 .
3: Review the landscape context	The review of the landscape context is defined in section 3 and is completed in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
4: Discuss the local and regional character of Aboriginal land use and its material traces	The local and regional character of Aboriginal land use and its material traces is described in section 4.1 The Archaeological Context and in Appendix 6 , the Archaeological Report which has been prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
5: Predict the nature and distribution of evidence	A predictive model is described in section 5 and has been prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
6: Undertake an archaeological survey	An archaeological survey of the study area was undertaken on Friday the 24 th of July in accordance with the Code of Practice for Archaeological

	Investigation of Aboriginal Objects in New South Wales 2010. The results of the survey are described in the archaeological report (Appendix 6).
7: Decide if additional archaeological investigation is required?	Refer to the archaeological report (Appendix 6). The archaeological assessment and results described in attachment A determined that it is appropriate to undertake further archaeological investigation at the study area. A test excavation program is proposed for the study area.
8: Document findings and interpretation of results in an Archaeological Report	Refer to the archaeological report (Appendix 6). Report prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010. This report is expanded following the outcomes of the test excavation program for the study area.
9: Seek cultural information from Registered Aboriginal Parties	Information on the cultural information for the study area is sought during the methodology review and as per requirement 3 of the Aboriginal cultural heritage consultation requirements for proponents 2010. Information gathered includes places of social, spiritual and cultural value, historic places with cultural significance, and potential places/areas of historic, social, spiritual and/or cultural significance. Information gathered will be used to further inform how the landscape was used, the social, cultural, aesthetic, historic and scientific values to enable an overall assessment of the significance of the study area and the associated values. Assessing values and significance will be undertaken as per section 2.4.2 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011.
10: Determine if there will be harm to cultural heritage	Harm, or potential harm will be assessed as per section 2.5 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011. Assessing measures to avoid harm will be considered in accordance with sections 2.6 and 2.7 from the same guide. Registered Aboriginal knowledge holders will be consulted during this process as per the Aboriginal cultural heritage consultation requirements for proponents 2010 to help determine management options and mitigation measures.
11: Complete ACHAR	An Aboriginal Cultural Heritage Assessment Report will be prepared in accordance with section 3 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011.
12: Complete and Submit AHIP if required	If there is a requirement to request an Aboriginal Heritage Impact Permit, this will be done in accordance with Applying for an Aboriginal Heritage Impact Permit: Guide for applicants 2011. For State Significant

	Development refer to Environmental Planning and Assessment ACT 1979 Section 4.41(d).
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Table 1: ACHA Methodology

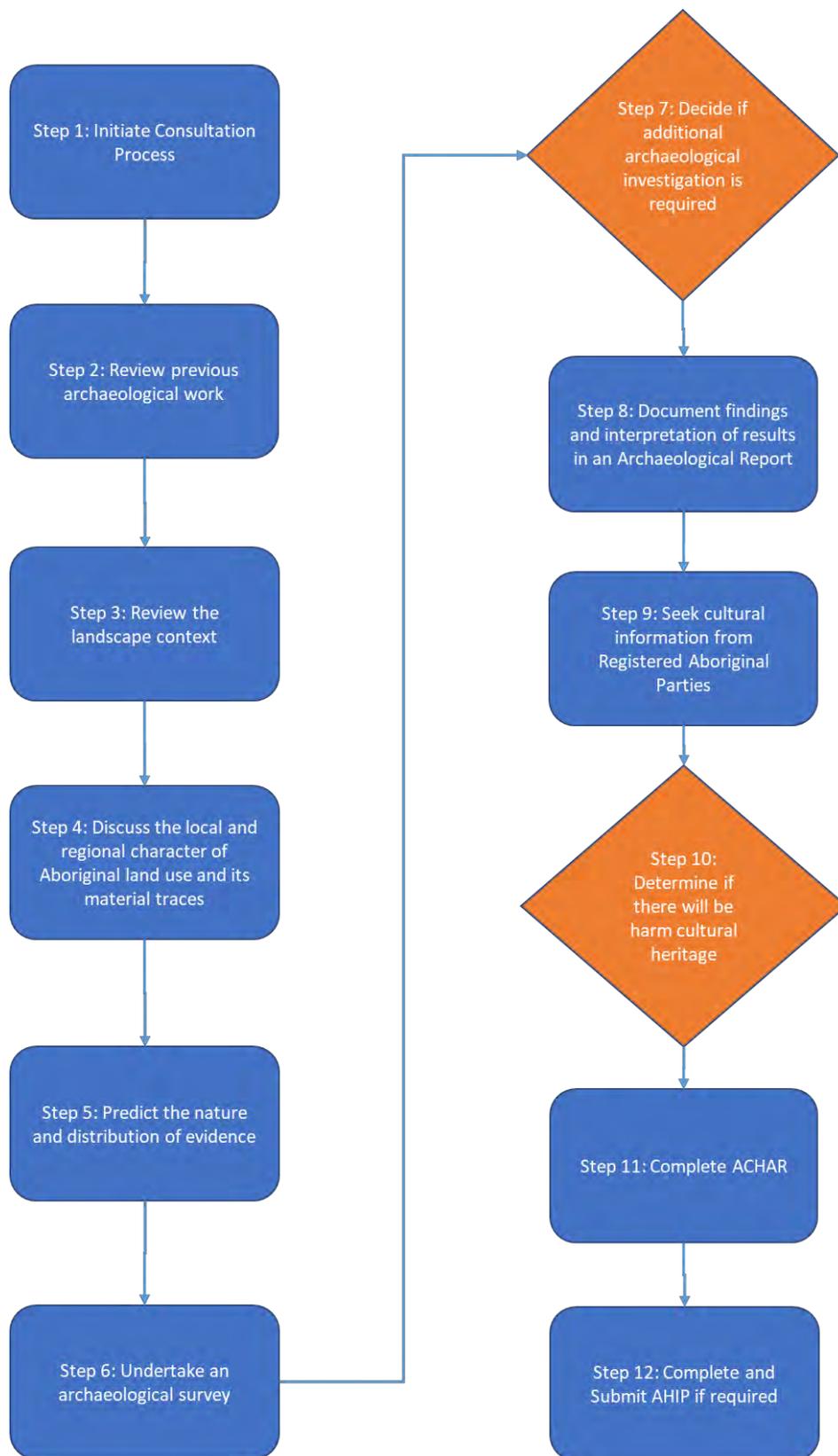


Figure 5: ACHA Methodology

3 Landscape and Environmental Context

3.1 Topography, Geology, Soils and Vegetation

The study area is located within the lowland areas of the South Coast of New South Wales. The landscape of the local and surrounding area can be characterised undulating topography, with landform elements including flats, very gentle to steep slopes, low rises and ridgelines, and crests. The surface geology is part of the Milton Monzonite an igneous intrusion from the Mesozoic (NSW Department of Mines 1966).



Figure 6: Geological map showing the study area over the Milton Monzonite (Mmm). Source Geological map overlay © New South Wales Government, Australia.

The terrain and soils of the study area are described in the Digital Atlas of Australian Soils as Me1: Hilly with some steep slopes and small graded valleys: moderately steep rounded hills of brown and red friable earths (*Gn3.21 and Gn3.22 and Gn3.11 and Gn3.12*) in association with less rounded hill slopes of hard acidic yellow mottled soils (*Dy3.41*), hard acidic red soils (*Dr2.21*), and yellow leached earths (*Gn3.54*), and also other hill slopes of loamy soils having an A2 horizon (*Um4.2*) with yellow-brown earths (*Gn2.44*) (Northcote *et al.* 1960-68).

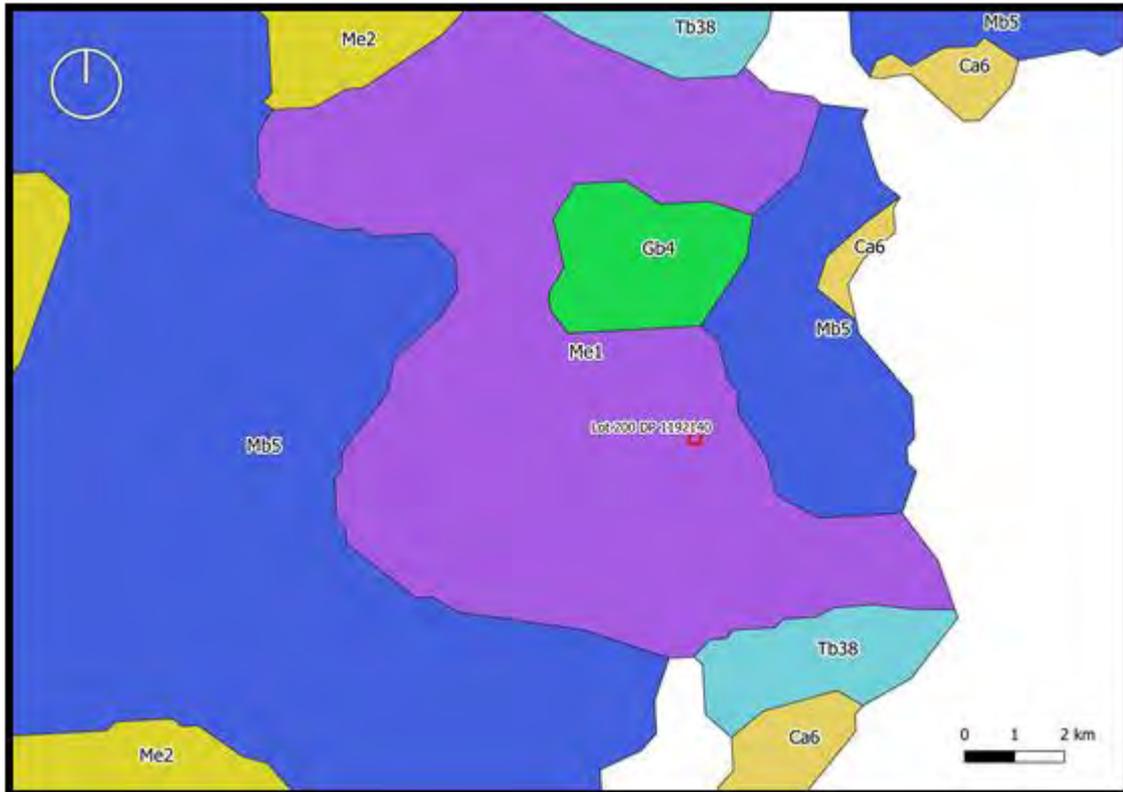


Figure 7: Map of the soil category of the study area. Budawang SSP is located within the purple area representing the Me1 soils (Source Australian Soil Resource Information System).

The vegetation of the study area has been significantly modified by historic European land management practices. Figure 8 shows an aerial image of the study area taken in 1959. All vegetation had been removed from the study area by this time. The study area is most likely to have been originally covered with the critically endangered Milton Ulladulla Subtropical Rainforest. This rainforest community occurs on the soils derived from the Milton Monzonite, and soils derived from the Conjola formation that have been enriched by the basaltic Monzonite soils. Table 2 shows a list of species of plants and trees that are characteristic of the rainforest however the overall number of species is much greater than listed in this table. This is the southern limit for a number of the rainforest species that occur and that are rare on the South Coast (NSW Department of Planning, Industry and Environment 2019).

<i>Acmena smithii</i>	<i>Gymnostachys anceps</i>
<i>Adiantum flabellifolium</i>	<i>Legnephora moorei</i>
<i>Alectryon subcinereus</i>	<i>Malaisia scandens</i>
<i>Aphanopetalum resinosum</i>	<i>Marsdenia rostrata</i>
<i>Arthropteris tenella</i>	<i>Notelaea venosa</i>
<i>Baloghia inophylla</i>	<i>Oplismenus imbecillus</i>
<i>Breynia oblongifolia</i>	<i>Pandorea pandorana</i>

<i>Cissus antarctica</i>	<i>Pellaea falcata</i>
<i>Cissus hypoglauca</i>	<i>Pittosporum undulatum</i>
<i>Citriobatus pauciflorus</i>	<i>Plectranthus parviflorus</i>
<i>Clayoxylon australe</i>	<i>Sarcopetalum harveyanum</i>
<i>Dendrocnide excelsa</i>	<i>Smilax australis</i>
<i>Diospyros australis</i>	<i>Stephania japonica</i>
<i>Doodia aspera</i>	<i>Streblus brunonianus</i>
<i>Eustrephus latifolius</i>	<i>Syzygium australe</i>
<i>Ficusspp.</i>	<i>Toona ciliata</i>
<i>Geitonoplesium cymosum</i>	

Table 2: Characteristic Plant and Tree Species from the Milton Ulladulla Subtropical Rainforest (NSW Department of Planning, Industry and Environment 2019).



Figure 8: 1959 Aerial image of the study area showing all vegetation has been cleared from the land. Source Spatial Services NSW Government.

3.2 European Land Use History

The study area was first purchased as a Crown Land Grant by John Fisher Cambage on the 1st of June 1853. J F Cambage purchased both Portions 120 and 121. J. F. Cambage who was a farmer (NSW Government Gazette 1897) had a cottage built at nearby Wilfords Lane in 1868

by master building James Poole. This cottage was named Applegarth and included a dairy farm complex including garden and cheese press. The cottage is still standing and both the cottage and farm are listed in the NSW State Heritage Inventory as locally significant heritage (NSW State Heritage Inventory). Cambage did not live on Portion 121 (the study area) and there is no record of any structures having been constructed on Portion 121. J. F. Cambage died in December 1896 (NSW Government Gazette 1897). In 1950 there was a Deed of Conveyance for the Portions 120 and 121, now called lots 1 and 3 DP811690 to Gordon and Henry Porter. In 1971 there was a Grant of Probate of the land to Henry John Porter and Katherine Lawrence Rickson. Following the death of Katherine Lawrence Rickson the title was certified to Henry John Porter in 1991 (Hazletts 2020). Electoral rolls from 1963 and 1968 indicates that Henry Porter was a farmer who resided on the Princess Highway at Milton. Henry John Porter was a dairy farmer who resided at Hilltop, Milton (Ancestry.com 2010, Australian Electoral Commission Rolls).

Aerial imagery of the study area from 1959 shows that the land was clear of vegetation and there are no buildings or other structures (refer to Figure 10). A 1991 aerial image of the study area shows the first building on the site at the location of the present pre-school building. The most likely use for the study area was for grazing and growing pasture. As part of this assessment, no historical records were found that indicates any historical structures or buildings had been built on Lot 200 DP1192140 (Portion 121).



Figure 9: Aerial image from 1959. Source Spatial Services NSW Government.

4 Aboriginal cultural heritage context

4.1 The Archaeological Context

Previous archaeological studies for the South Coast and the hinterland have revealed that the coast and hinterland have been inhabited by Aboriginal people from the late Pleistocene. Pleistocene dates for habitation of have been obtained from the rock shelter at Burrill Lake (Lampert 1971) and the shell midden at nearby Bass Point (Bowdler 1970). Pleistocene dates have also been obtained from South Coast hinterland sites dating back to 19,000 years BP (Boot 2002:316).

During the early phase of occupation of the coast, during the late Pleistocene, the coastal shoreline was further east than it is today and the intertidal zone and the distance to the edge of the continental shelf was much narrower than it is today. Lampert and Hughes (1974) argued that the smaller intertidal coastal strip combined with the fishing technologies employed during the period, before 7000 to 5000 years BP, meant that limited resources would have been obtained from the coast. Callahan (1980) also described the importance of the shelf in providing habitats for a greater diversity and quantity of species, and given that Aboriginal people did not go out to sea to fish, the width of the shelf during the late Pleistocene would have significantly affected the availability of the resources. Lampert and Hughes argued that while the sea was rising, land based resources may have been more productive than those obtained from the coast, though Callahan (1980) argues that land based resources would not have been as available during the late Pleistocene as they were during the recent more stable Holocene. The coastal strip along the east coast of Australia during the late Pleistocene was also a much drier place and may have been sparsely populated (Bowdler 2010). Bowdler noted that along the entire east coast of Australia there are only three coastal sites recorded with Pleistocene dates, Burrill Lake, Bass Point and Wallen Wallen Creek, and the dates for Burrill Lake and Bass Point may not be reliable due to the difficulty associating the datable material with human occupation of the sites. Boot (2002:318) argued, on the basis of his study of the large sandstone shelters of South Coast hinterland, that during the terminal Pleistocene the hinterland was subjected to more intense occupation and resource exploitation than the nearby coastal areas.

Some coastal habitation sites used before the sea reached its present level are now likely to be submerged, as the shoreline 20000 years ago was between 100 and 150 metres lower than it is today, and in many cases would have been a significant distance east from where it is today (Lampert and Hughes 1974). The current sea level was reached between 7700, and 7900 years BP (Sloss, et al. 2007). The dates obtained from most coastal and estuarine sites date from within this time and up to the recent past. In the Sydney area, which has been subjected to more coastal archaeological studies due to the more intensive coastal development, the ages of most occupation sites have been recorded as being within the last 3000 years (Attenbrow 2012).

Lampert and Hughes (1974) argued that in the last 5000 to 7000 years there was a much greater efficiency in the harvesting of marine food resources along the coast than during the preceding period. This was due to the new fishing technologies employed, included fish hooks and spears. When fishhooks began to appear in the archaeological deposits, there was found to be a correlating increase in the number of species of fish evident in the deposits (Lampert and Hughes 1974:230). Shell fishhooks first appear in the archaeology ca 1000 years ago (Attenbrow 2012). Lampert and Hughes (1974) found that from the stratigraphy from three excavated sites on the NSW coast that bone tipped spears came into use earlier than the shell fish hook. At the Currarong shelters 1, 2 and 3 excavated on the south coast near Nowra, a large number of bone points (46) were identified, most of which came from the upper spits of the shelter excavations. The base layers from these sites had maximum dates of 1790, and 3740 years BP (Lampert 1971). Attenbrow (2002:99) found excavation results from a range of coastal sites around Sydney showed the appearance of bone points from ca 2500 to 3000 years ago. With the arrival of technologies including the spear, line and hook, and the canoe, this enabled a greater exploitation of marine and estuarine resources along the coast (Lampert and Hughes 1974:230-231).

Changes in stone tool technology along the south coast show the arrival of the Bondaian industry and small tools, aligning with the technological changes that are evident for the greater Sydney Basin and east coast of the continent. At Burrill Lake simple scrapers are dominant during the early phases and then around 5000 BP shows the arrival of the Bondaian and small tools, including the presence of Bondi Points and the use of backing (Lampert 1971). Boot (2002:321) concluded that Pleistocene artefact assemblages in the South Coast hinterland are dominated by large flakes, cores and flake pieces, and will also include artefacts derived from pebbles and small flakes of quartz. Boot found that for Holocene assemblages, they mostly comprise of unmodified flakes and a small number of retouched and backed artefacts with little evidence of specialisation. Raw materials generally consisted of volcanic material and quartz and were derived from pebble cores sourced from nearby stream channels. Boot (2002:197) observed a trend where Holocene artefacts became smaller than the Pleistocene artefacts.

Archaeological research and ethnographic records indicate that the shoreline has a greater distribution and density of campsites and had a larger population than the hinterland (Lampert and Hughes 1974:231). Though this finding may no longer hold true today. Boot's (2002) review of ethnographic evidence found that a single social and economic group, the Yuin, occupied the coast, hinterland and Eastern Tablelands of the South Coast and that both the coast and hinterland were occupied throughout the year. Boot found that there was no evidence to support seasonal changes in occupation, which had been hypothesised by earlier researchers.

Archaeological investigations of both open and closed sites on the coast has revealed that, as well as being sites of occupation, some sites were also used for human burials (Megaw 1968,

Lampert 1971, Haglund 1977, Hope 2006). It is uncertain whether the role of sites changed between occupation and burial. Haglund (1977) found that there was no evidence of the abandonment of sites at the time of burials and there was no evidence of the use of burial pits.

Sullivan (1982) completed a study of midden sites along the east coast of New South Wales found that a key factor in the location of sites was the close proximity to fresh water. Proximity to high order streams has also been an important factor in the location of sites for studies carried out in Sydney and on the Cumberland Plain (White and McDonald 2010, Kohen 1987). Boot (2002:316-317) found that for the South Coast hinterland sites, higher density sites were associated with areas of high biodiversity, and that economies were focussed upon biodiverse woodlands and open forests. Boot's Holocene occupation model predicted that the most favourable occupation sites were in 'flat open areas within the river valley woodlands, and dry open forests.' Other areas predicted as favourable locations included open forest areas on broad ridges that had available water, and 'tall damp forest adjacent to rainforest (Boot 202:318).' On the basis of his own research and the assessment of other studies undertaken throughout the South Coast hinterland Boot (2002:319) predicted that the most intensively used sites were either within or close to woodlands within valleys of the larger rivers, and also distributed along the major ridge lines in the areas of drier forest. Boot (2002:317) concluded that Aboriginal people obtained resources from, and used, all of the landscapes and types of environments in the hinterland. The degree of use depended upon the economic returns from each landscape and environment.

Middens and coastal deposits represent both the marine and terrestrial resources that were part of the diet of the Aboriginal people. The results of archaeological excavations of deposits around Port Jackson and Broken Bay reveal that terrestrial mammals, birds and reptiles also contributed to the diet of the people living on the coast (Attenbrow 2002:70-76). The diet was not solely obtained from the marine and estuarine resources. Land and water mammals, birds and reptile bones were also found in the deposits at Currarong and Burrill Lake shelters on the south coast (Lampert 1971). The archaeological evidence also indicates that around 1500 to 700 years BP there was an increase in the use of mussels and small gastropods in the diet of Aboriginal people exploiting the resources along the coast (Boot 2002:82, Sullivan 1982:145-146). In the hinterlands of the South Coast, the most common ethnographically recorded foods used by the local Aboriginal people included *Macrozamia sp.* (cycad), Kangaroos, and fish as well as a variety of other marsupials, and plant species. On the coast the most commonly recorded foods were fish and possums (Boot 2002:82).

Key factors drawn from the research and our present understanding of the archaeology of the South Coast, lowlands and hinterland include:

- Available radiocarbon determinations indicate Aboriginal people have occupied the South Coast for potentially longer than 20,000 years;

- Aboriginal settlement patterns on the South Coast have been linked to a variety of environmental factors, including proximity to fresh water, and proximity to areas of high biodiversity;
- High density surface sites will occur on landform elements including broad open ridges, and flat areas closely associated with woodlands and major river valleys;
- Artefact distributions and sites may be found anywhere within the landscape but will generally be small and consist of low numbers of artefacts if they are not associated with the significant landscape features described in the previous point.

4.2 Previous Archaeological assessments

Archaeological investigations have been conducted within the zone of the extensive AHIMS search carried out for the study area. The outcomes of these studies are summarised as follows:

In 2001, a cultural heritage assessment was undertaken for the Milton/Ulladulla Sewerage Scheme from Narrawallee to Dolphin Point. Previous studies have recorded over 110 Aboriginal sites in the Milton/Ulladulla region primarily consisting of middens. Other site types include open camps, scarred trees, grinding grooves, rock shelters and a quarry. There are 14 Aboriginal sites and five historic sites situated in the study area. The study area overlies the Conjola formation which is characterized by elevated coastal headlands and ridges. Estuaries and lakes surround the area and small drainage lines and fluvial corridors stem from the coastal catchment. The study area has undergone extensive land disturbance which has potentially disrupted archaeological material. During the survey, two middens and two isolated finds were exposed. One of the middens was found on the southern edge of Narrawallee Inlet and the other on the upper slopes of the headland slopes on Bannisters Point. One of the isolated finds was located opposite to a dirt track in Blackburn Point. The second was found on the northern side of Kings Point Drive. In addition, 11 potential archaeological deposits were identified, five of which have high or moderate potential. Furthermore, an area adjacent to Lake Tabourie was identified as moderate to high potential. The potential archaeological deposits are generally found near lakes, tributaries and on dune ridges. Two historic sites were also found, consisting of a rail fence and potential tramway platform remnant. In 2002 the development area was relocated and consequently six new Aboriginal recordings were made including two scarred trees, two artefact scatters, one isolated find and one potential archaeological deposit.

In 2001, a cultural heritage assessment was commissioned by Shoalhaven City Council and the Department of Land and Water Conservation to be undertaken in the Conjola Lake area. The archaeological sites predicted include open artefact scatters, occurring along elevated areas towards water sources. Furthermore, there is potential for isolated finds, middens, burials, quarries and potential archaeological deposits. The study area is mainly located on the upper slopes and crests of a major ridgeline between Washerwoman's Creek and Berringer Lake catchment. The geology is composed of conglomerates and sandstone

bedrock from the Conjola formation. The vegetation consists of native eucalypts and shrubs but is somewhat disturbed from human activity. The survey area included the Northern Wastewater Treatment plant, Southern Wastewater Treatment Plant, wastewater pumping stations and Exfiltration site. No Aboriginal sites were found in these locations however, an Aboriginal site was located 30 m from the wastewater pumping station. The study area also included pipeline routes which resulted in 21 Aboriginal sites and isolated finds, two potential archaeological deposits, two historic sites and eight areas requiring monitoring. The pipeline routes cross over a variety of landscapes including some bushland, sections of lake Conjola and beach areas. The routes tend to be located in road verges and along easements through properties.

In 2004, Navin Officer Heritage Consultants undertook an archaeological subsurface testing program where Hazcorp Pty Ltd proposed to develop a residential suburb. A total of 415 lithic items were recovered. 129 of the items were identifiable as Aboriginal objects and 286 were nondescript lithic fragments or heat shattered rock. The items were composed of silcrete, quartzite, quartz and chalcedony. The assemblage represents an average density of artefacts for the area and indicates that the site was used for transient occupation. The proposed development location is on the coastal ranges west of Narrawallee Beach and overlies the Conjola formation resulting in a conglomerate and sandstone bedrock. Some clays are apparent towards the surface of an exposed ridge. The area is disturbed by human activity, particularly along the ridgeline and there is evidence of a quarry towards the south. The vegetation in the area is dominated by eucalypts and turpentine, however it has been mostly cleared. There are several natural sources of silcrete and quartzite. Most artefacts occurred in the upper layers of soil (0-40cm) and the highest density of material was located on the northern end of the spur line. There is a lack of cultural material on the slope of the spur line towards the drainage lines.

In 2005, Michael Therin, Robyn Farrell and Andrew Wellington undertook an Aboriginal Heritage survey for proposed upgrade of Croobyar Bridge near Milton. During the survey no Aboriginal sites were located, possibly due to the dense ground coverage. The site however has a high potential for sub-surface archaeology. Consequently, the entire area has been defined as a potential archaeological deposit. The study area is located either side of Croobyar Creek, west of the existing bridge. Croobyar Creek is a major source of permanent, fresh water and contains two minor drainage lines at the south. The site is located on alluvial soil towards the south with a sandstone bedrock. It is extensively cleared with the only vegetation being pastures. There are 24 registered sites in the 5km surrounding the study area including, campsites, isolated finds and middens.

In 2005, Navin Officer Heritage Consultants Pty Ltd conducted an archaeological subsurface testing program for a proposed upgrade to a bridge at Croobyar Creek north of Milton. The study area is located on the Milton Monzonite intrusion, resulting in low, undulating slopes. There is silcrete on the coastal lowlands. Croobar Creek runs through the area, draining into the Tasman Sea. There are two minor tributaries running through the area

towards Croobyar Creek. The area is dominated by native eucalypts forests and woodlands however European influence has resulted in the introduction of new species and land clearing. Previous studies of this study area showed no archaeological material however the entire area was declared as a potential archaeological deposit (PAD) due to its proximity to permanent water and archaeological sensitivity throughout the region. During this investigation a total 206 lithic items were recovered from 18 test pits in the PAD. The density of the artefacts was low for the region however there were localized concentrations of artefacts. The artefacts were predominantly composed of silcrete and quartz. The results of the testing indicate that the creek line was a focus of activity and occupation.

In 2005, Navin Officer Heritage Consultants Pty Ltd conducted an archaeological subsurface testing program for the Conjola Regional Sewerage Scheme. The study area overlies the Conjola Formation subgroup of the Shoalhaven Group. The underlying rocks consists of conglomerates and sandstone with gravel, sand and clay deposits. During the program, a total of 506 lithic items were recovered. 353 of the items were identifiable as Aboriginal artefacts and 153 were nondescript. The artefacts were predominantly composed of silcrete and quartz. The most common artefact type were flakes, lithic fragments and micro blades. Shell was recovered from a site situated on sand dunes next to the estuary. The areas that displayed the highest diversity and density in assemblages occur on coastal margins. There were also high-density assemblages at the upper reaches of Conjola Lake. While the density of the artefacts is relatively high, the ground was disturbed, particularly in the upper 15cm and was assessed as having low to moderate significance.

In 2006, South East Archaeology Pty Limited was commissioned by Elderslie Property Investments Pty Ltd to undertake an Aboriginal Heritage impact assessment in a residential development area called "Springfield Meadows" on the South Coast of NSW. In total, there were 323 stone artefacts found in the study area. The study area was divided into six sections based on environmental contexts and five showed potential to hold in situ deposits, all bordering Millards Creek. Springfield Meadows lies on the Conjola Formation and some of the Milton Monzonite. The area is in undulating, coastal lowlands with the northern boundaries containing a ridge crest. The underlying geology is composed of conglomerate and sandstones with silcrete boulders occurring throughout the study area. The area is extensively cleared of vegetation; however, grasses and sporadic regrowth of native species occur towards the south. Previous studies surrounding Springfield Meadows indicate that scarred trees, rock shelters with deposits, carved trees and a quarry were among the most common sites, with the nearest being a scarred tree 200m northwest. Predictive models indicate that artefact scatters are the most common assemblage found in the study area and ceremonial sites, carved or scarred trees, grinding grooves, quarries, middens, occupational deposits and stone arrangements will be unlikely due to topography, distance from natural sources, and various environmental factors. The deposits were predominantly composed of silcrete with some quartzite, quartz, rhyolite, basalt or chert. The artefacts consist primarily of flakes and cores with some lithic fragments, hammerstones and retouched pieces. The artefact scatters were bordering Millards Creek and the only locations assessed as having

potential in situ deposits are the hill slopes surrounding Millards Creek. There are also potential low-density assemblages further inland, however due to the distance from Millards Creek, the deposits are more likely to be disturbed with low archaeological value.

In 2006, an archaeological salvage was conducted for the Conjola Regional Sewerage Scheme, during which, a total of 900 stone artefacts were recovered from eight sites. The assemblages were composed of locally sourced silcrete with evidence of manufacture present at almost all sites. Some sites, with smaller assemblages didn't show evidence of hammerstones or cores, which were used to indicate on-site reduction in the larger assemblages. The study area overlies conglomerate and sandstones bedrock from the Conjola Formation. Seven of the salvage locations are near the coast on the elevated headlands, slopes and estuaries from small creeks. The remaining five are on the western estuarine shores of Conjola lake at elevated areas. The largest assemblage in the salvage was recovered from the western margin of Lake Conjola where 315 artefacts were found including elongated flakes, backed artefacts and retouched flakes. The salvage represents a higher than average density of artefacts compared to previous studies in the region.

4.3 Registered AHIMS Sites

A search of the Aboriginal Heritage Information Database was completed on the 24th of September 2020 for a 3km radius around the study area. The search returned 99 recorded Aboriginal sites (refer to Table 2). Figure 10 shows the sites plotted on a map in relation to the study area. There are no Aboriginal sites located in the project area.

Site ID	Site name	Site features	Site types
58-1-0343	Burrill lake site 29	Shell, Artefact	Midden
58-1-0345	Burrill lake site 31	Artefact	Open Camp Site
58-1-0346	Burrill lake site 32	Shell, Artefact	Midden
58-1-0347	Burrill lake site 33	Artefact	Shelter with Deposit
58-1-0348	Burrill lake site 34	Shell, Artefact	Midden
58-1-0349	Burrill lake site 35	Shell, Artefact	Midden
58-1-0350	Burrill lake site 36	Shell, Artefact	Midden
58-1-0351	Burrill lake site 37	Shell, Artefact	Midden
58-1-0031	Milton;	Modified Tree (Carved or Scarred)	Carved Tree
58-1-0352	Burrill lake site 40	Shell, Artefact	Midden

58-1-0353	Burrill lake site 38	Shell, Artefact	Midden
58-1-0354	Burrill lake site 39	Shell, Artefact	Midden
58-1-0355	Burrill lake site 41	Shell, Artefact	Midden
58-1-0356	Burrill lake site 42	Shell, Artefact	Midden
58-1-0357	Burrill lake site 43	Artefact, Shell	Midden
58-1-0358	Burrill lake site 44	Shell, Artefact	Midden, Open Camp Site
58-1-0359	Burrill lake site 45	Shell, Artefact	Midden
58-1-0361	Burrill lake site 48	Shell, Artefact	Midden
58-1-0362	Burrill lake site 47	Shell, Artefact	Midden
58-1-0364	Burrill lake site 58	Shell, Artefact	Midden
58-1-0365	Burrill lake site 59	Shell, Artefact	Midden
58-1-0366	Burrill lake site 60	Shell, Artefact	Midden
58-1-0367	Burrill lake site 64	Shell, Artefact	Midden
58-1-0368	Burrill lake isolated find I	Artefact	Isolated Find
58-1-0369	Burrill lake isolated find_J	Artefact	Isolated Find
58-1-0712	MUB1	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0713	MUB2	Artefact	Open Camp Site
58-1-0282	Burrill lake Site 51	Shell, Artefact	Midden
58-1-0283	Burrill lake site 52	Shell, Artefact	Midden
58-1-0285	Burrill lake site 54	Shell, Artefact	Midden
58-1-0286	Burril lake site 55	Shell, Artefact	Midden
58-1-0287	Burrill lake site 57	Shell, Artefact	Midden
58-1-0709	MUB3	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0293	Burrill lake site 61	Shell, Artefact	Midden

58-1-0298	Burrill lake site 56	Shell, Artefact	Midden
58-1-0299	None Specified	Artefact	Open Camp Site
58-1-0635	Site 3;	Artefact	Open Camp Site
58-1-0638	Site 4;	Artefact	Open Camp Site
58-1-0639	Site 5;	Artefact	Open Camp Site
58-1-0642	Burrill L. Shelter 4;	Artefact	Shelter with Deposit
58-1-0643	Racecourse Creek 2;	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0644	Racecourse Creek 1;	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0078	Bannisters Point;Mollymook;	Stone Quarry, Artefact	Quarry
58-1-0026	Narrawalle Inlet;Conjola Beach;	Shell, Artefact	Midden
58-1-0027	Conjola Beach;	Shell, Artefact	Midden
58-1-0830	CS1	Artefact	
58-1-0831	CS2	Artefact	
58-1-0929	MUPHST	Modified Tree (Carved or Scarred) : 1	
58-1-0934	NW3 - Isolated Find	Potential Archaeological Deposit (PAD) : 0	
58-1-0935	NW5 (PADNW1)	Potential Archaeological Deposit (PAD), Artefact : 129	
58-1-0641	IF 2;	Artefact	Isolated Find
58-1-0363	Burrill lake site 49	Shell, Artefact	Midden
58-1-0727	Blocks 6 & 7	Artefact	Open Camp Site
58-1-0728	Narrawallee	Artefact	Open Camp Site

58-1-0932	NW3	Artefact : 1	
58-1-0930	NW1	Artefact : 7	
58-1-0931	NW2	Artefact : 1	
58-1-0968	PAD Croobyar Creek CCPHS	Potential Archaeological Deposit (PAD) : 1	
58-1-0969	PAD Croobyar Creek CCPHN	Potential Archaeological Deposit (PAD) : 1	
58-1-0958	CS22 - Lake Conjola Entrance Road 2	Modified Tree (Carved or Scarred) : 1	
58-1-0959	PAD3 (Conjola Sewerage Scheme)	Potential Archaeological Deposit (PAD) : 1	
58-1-0960	CS26 - Conjola Sewerage 26 and PAD5	Potential Archaeological Deposit (PAD) : 1, Artefact : 1	
58-1-0961	CS21 - Lake Conjola Entrance Road 1	Modified Tree (Carved or Scarred) : 1	
58-1-0963	CS23 Lake Conjola Isolated Find 4	Artefact : 1	
58-1-0964	NW4 (Narrawallee 4)	Artefact : 15	
58-1-1019	Springfield 3 (S3)	Artefact : 268	
58-1-0284	Burrill lake site 53	Shell, Artefact	Midden
58-1-0290	Burrill lake isolated find K	Artefact	Isolated Find
58-1-1041	Matron Porter Drive AS1	Artefact : 1	
58-1-1094	Garrad Reserve 1	Shell	

58-1-0719	Pattimores 1	Artefact	Open Camp Site
58-1-0720	MP1	Artefact	Open Camp Site
58-1-0721	LC IF2	Artefact	Isolated Find
58-1-0722	LC IF1	Artefact	Isolated Find
58-1-0723	Ulladulla STP 1	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0724	Ulladulla STP 2	Shell, Artefact	Midden, Open Camp Site
58-1-0725	Ulladulla STP 3	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0726	Ulladulla STP 4	Artefact	Open Camp Site
58-1-0718	Ulladulla Site	Artefact	Open Camp Site
58-1-0717	MUB4	Artefact	Open Camp Site
58-1-0729	GD1	Modified Tree (Carved or Scarred)	
58-1-0730	Conjola Spur 1	Artefact	
58-1-0822	MU1	Artefact	
58-1-0823	BANNISTERS POINT MIDDEN	Artefact	
58-1-0824	MU IF2	Artefact	
58-1-1006	Burril Lake Site 46	Shell	
58-1-1007	Springfield 1 (S1)	Artefact : 1, Shell : 1	
58-1-1008	Springfield 2 (S2)	Artefact : 1, Shell : 1	
58-1-1009	Springfield 3 (S3)	Artefact : 1, Shell : 1	
58-1-1010	Springfield 4 (S4)	Artefact : 1, Shell : 1	
58-1-1011	Springfield 5 (S5)	Artefact : 1, Shell : 1	
58-1-1012	Springfield 6 (S6)	Artefact : 1, Shell : 1	
58-1-1025	USP-OS-2 (formerly PAD 1 Ulladulla Sports Park)	Potential Archaeological	

		Deposit (PAD) : 1, Artefact : 19	
58-1-1026	USP-IF-1	Artefact : 1, Potential Archaeological Deposit (PAD)	
58-1-1027	USP-OS-1	Artefact : 2, Potential Archaeological Deposit (PAD)	
58-1-1055	Narrawallee Creek Inlet	Artefact	
58-1-1056	Narrawallee Southern Reserve	Artefact	
58-1-1057	Narrawallee Southern Reserve 1	Artefact	
58-1-1095	Matron Porter Drive AS	Artefact	

Table 2: Registered AHIMS sites recorded within 3km radius of the study area.



Figure 10: AHIMS sites plotted on a map showing the distributions in 3km radius around the study area (green). Source Sixmaps © Department Finance, Services and Innovation.

4.4 Discussion

A review of the results of previous studies undertaken within the locality and the registered sites on the AHIMS database suggests that sites may be found anywhere across the landscape. Sites may occur anywhere across the locality and are most likely to be middens close to the major waterways and coastline, or open sites consisting of artefact scatters, isolated artefacts and PADs along creeks, ridges, and lowland areas. There is also potential for scarred trees. All sites within the search area are recorded as open sites. There are no closed sites, or ceremonial sites recorded within the search area.

5 Predictive Model

The assessment of the archaeological potential of the study area is based upon the assessment of the landscape and landform features, assessment of the environment aspects of the site including potential resource areas (Owen and Cowie 2017), the degree of the disturbance of the landscape, proximity to freshwater, and the review of the AHIMS site data and previous reports undertaken within the locality. It will be further informed by the consultation with Aboriginal knowledge holders.

5.1 Stream Order, Topography and Artefact Concentrations

The study area is located on gently sloping ground to the west on the side of a low ridgeline. A non-perennial first order stream passes along the western margin of Lot 200. The nearest higher order stream is Pettys Creek approximately 660 metres from the study area, and 900 metres from the proposed development footprint. Figure 11 shows the streams present in the vicinity of the study area.



Figure 11: Creeks shown within and around the study area. Streams data accessed from Spatial Services NSW. Source Sixmaps © Department Finance, Services and Innovation.

5.2 Economic Zones

A review of the spatial data, geology, soils and vegetation for the study area suggests that the area would have been an area of high bio-diversity, and is likely to have been an important economic zone (Boot 2002, Owen and Cowie 2017).

5.3 Scarred Trees

There is potential for scarred trees to be present within the locality however, by 1959 the study area had been completely cleared of all trees and vegetation (refer to Figure 8) which would have removed any scarred trees if they were present.

5.4 Rock Shelters

There are no rock shelters within the study area or in this part of the coastal lowlands and no shelters that have formed within the Milton Monzonite. All of the sites recorded within the search radius are open sites.

5.5 Grinding Grooves

Grinding grooves will normally be associated with the softer sandstone bedrock which is more suitable for producing ground edges on the harder edges of stone tools. For example, grinding grooves are located on the sandstone platforms near Lake Conjola. There are no grinding grooves recorded on the Milton Monzonite.

5.6 Stone Raw Material Quarries and Source Locations

There are no known raw material sources or quarries within the study area. However, studies undertaken within the locality have identified local sources of raw material including chert, silcrete and volcanic materials (Boot 2002, South East Archaeology 2006). Eighteen hatchets heads recovered from the Murramarang Point were composed of raw material sourced from Milton (Boot 2002:341).

5.7 Ceremonial Grounds

There are no known ceremonial grounds at the site. Much of the landscape surface at the site has been subject to modification for development and/or from earlier land clearing for grazing. There is unlikely to be visible remains of ceremonial structures (e.g. Bora Rings) at the site. Boot's (2002:293-324) research of sacred and ceremonial places of the hinterland considered ethnographic accounts, and earlier research, and found that there was a preference for ceremonial places in elevated areas, such as in the mountains of the hinterland, or elevated areas within a locality, though this was not exclusive. He also referred to nineteenth century ethnographic accounts of large gatherings for ceremonies that occurred on the alluvial terraces in the significant valleys and along the main rivers of the South Coast. The presence of this site type may be further informed by the Aboriginal traditional knowledge holders for the study area.

5.8 Burial

Most known burial sites recorded on the South Coast occur on the coast and shores of the inlets, including in the sand dunes, middens and within rock shelters (Megaw 1968, Lampert 1971, Haglund 1977, Hope 2006, Boot 2002).

5.9 Registered Aboriginal Stakeholder Input

Clive Freeman from the Wreck Bay Community responded to the methodology review with the following information: *“This location is above an old campsite our family would visit. We have very strong connections to this area. The view to both Dithol and Bhewerre are of great significance. This Area holds a lot of stories connected to our family and the hills leading to the stringy bark forests were taught to us family to make the nets for king fish and bark canoes.”*

This response indicates that there is a campsite nearby that was subjected to repeated visitation. It also emphasises the significance of the view from the subject area to places of great significance.

5.10 Predictive Model Results

Based upon the landscape topography, proximity to water, geology, environment, and the results of previous studies from the locality, and the response from the RAP, the prediction for the site is for sites that include isolated or low density artefact concentrations. The study area is not associated with the landscape features that have been found to include higher concentrations of Aboriginal objects including river terraces in major valleys, broad ridgetop locations associated with water sources, or coastal areas associated with fresh water sources. The study area is within an area that would have been an area of high biodiversity, however it is on gently sloping terrain and is not considered likely to have been a camp or occupation site subject to repeated visitation, though it is close to a site that has been subjected to repeated visitation. The presence of Aboriginal objects are more likely to have been associated with people moving through the landscape, and with procurement of resources in the area which is likely to have been a biodiverse environment.

6 Archaeological Survey

A pedestrian archaeological survey was undertaken at the study area on two occasions. The first site survey was completed by William Moon, Tocomwall archaeologist on the 16th of September 2020 as part of a Due Diligence assessment, and the second survey was carried out on the 27th of October 2020 with Lee Carriage representing the Ulladulla Local Area Land Council. The area covered by the survey is shown in Figure 12. The survey covered all of the area of the proposed development footprint plus additional areas of the Lot that may be subjected to future development. The results of the archaeological survey are described in the Archaeological Report in Appendix 5. No Aboriginal objects were identified during the archaeological survey.



Figure 12: Pedestrian survey area shown in yellow hatching.

7 Test Excavation

A test excavation program was undertaken on the 3rd of December 2020 in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (2010) and the project archaeological investigation methodology. The excavation team included Tocomwall management and staff including Sam Franks, Robert Lester, and archaeologists Danielle Mitchell and Will Moon. Registered Aboriginal Party participants included Lee Carriage from the Ulladulla Local Area Land Council and Peter Markovic from the Wreck Bay Community. The results of the test excavation program are reported in the Archaeological Report included as Appendix 6 to this report.

7.1 Test Excavation Results

Two lithic artefacts were identified during the test excavation. One artefact identified from test pit A02 was a broken flake consisting of a medial piece of silcrete. Two negative flake scars are present on the dorsal surface. A second artefact was identified as a flake derived from a quartz pebble using the bipolar reduction technique. The flake retains a pebble cortex platform. The results of the test excavation suggest that a disperse low density distribution of artefacts occurs across the subject landform. The low number of artefacts identified has meant that meaningful analysis is not possible. The resulting low number of artefacts align with the present understanding of the archaeology of the South Coast, lowlands and

hinterland including that artefact distributions and sites may be found anywhere within the landscape but will generally be small and consist of low numbers of artefacts if they are not associated with significant landscape features such as broad open ridges with adjacent water sources, and flat areas closely associated with woodlands and major river valleys.

8 Aboriginal Community Consultation

8.1 Stage 1 Notification of project proposal and registration of interest

The purpose of the stage 1 notification is to identify, notify and register Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the area of the proposed project.

8.1.1 Identification of relevant Aboriginal stakeholders

An inquiry with the NNTT, determined the project area to be freehold and clear of any native title determinations. In accordance with step 4.1.2 in the Aboriginal cultural heritage consultation requirements for proponents 2010, Tocomwall contacted the following organisations for information on Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places in the project area (refer Appendix 2):

- Heritage NSW
- Ulladulla Aboriginal Land Council
- The Registrar, *Aboriginal Land Rights Act 1983*
- National Native Title Tribunal
- Native Title Services Corporation (NTSCORP)
- Shoalhaven Shire Council

8.1.2 Public notice

In accordance with the consultation guidelines (2010), a notice was placed in the local newspaper (refer Appendix 2):

- Milton Ulladulla Times on the 30th September 2020

The advertisement invited the registration of interest from Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project. There were no responses to the advertisement.

8.1.3 Registration of Aboriginal parties

In accordance with step 4.1.3 of the Aboriginal cultural heritage consultation requirements for proponents 2010, an invitation was sent to the list of Aboriginal organisations and names provided in step 4.1.2, inviting Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or places(s) in the project area, to

register an interest (Appendix 3). There were 10 organisations/people that responded (refer to Appendix 1):

A copy of the notification from 4.1.3 and a list of names of Aboriginal persons who registered an interest, was sent to Heritage NSW and Ulladulla Local Aboriginal Land Council in accordance with step 4.1.6 of the Aboriginal cultural heritage consultation requirements for proponents 2010 (Appendix 3).

8.2 Stage 2 presentation of information about the proposed project

The purpose of stage 2 of the consultation process is to provide registered Aboriginal parties with information about the scope of the proposed project and the proposed cultural heritage assessment process (refer to Appendix 1).

8.2.1 Presentation of Project Information Pack

Tocomwall provided a project information pack to all registered parties in accordance with step 4.2 in the Aboriginal cultural heritage consultation requirements for proponents 2010. The project information pack included project details, objectives of the Aboriginal heritage assessment, roles and responsibilities and a project schedule. The cover note and information pack can be found in Appendix 4.

8.3 Stage 3 gathering information about cultural significance

The purpose of stage 3 is to facilitate a process whereby registered Aboriginal parties can:

- Contribute to culturally appropriate information gathering and the research methodology
- Provide information that will enable the cultural significance of Aboriginal objects and/or places on the proposed project area to be determined
- Have input into the development of any cultural heritage management options

8.3.1 Archaeological assessment methodology information pack

As specified in stage 3 of the Aboriginal cultural heritage consultation requirements for proponents 2010, an ACHA methodology, accompanied with a survey report, were sent to the registered parties for feedback on the 3rd of November 2020. Knowledge holders were given 28 days to provide feedback. Responses can be found in Appendix 4 and in Table 3.

RAP Submission	RAPs Comments	Response
Clive Freeman, Freeman&marx Pty Ltd	This location is an old campsite our family would visit. We have very strong connections to this area. The view to both Dithol and Bhewerre are of great significance. This area holds a lot of stories	These values have been captured and reported in the Aboriginal cultural heritage significance section of this report.

	connected to our family and the hills leading to the stringy bark forests were taught to us family to make the nets for king fish and bark canoes. I would love for me and my sister to participate in this test pitting as this area is very strongly connected to our family. Ardler-Brown.	A representative from this RAP group participated in the Test Excavations carried out at the study area.
Ulladulla LALC	The Ulladulla Local Aboriginal Land Council is happy with the recommendations/methodology suggested by Tocomwall Archaeology for the work being carried out at the Budawang School in Milton.	No further action required. A representative from the Ulladulla LALC participated in the Test Excavations carried out at the study area.

Table 3: RAP responses to the methodology.

8.3.2 Test excavation notification

In accordance with section 3, requirement 15c of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, notification for the test excavation was sent to Heritage NSW on the 11th November 2020.

8.4 Stage 4 review of draft Aboriginal cultural heritage assessment report

The purpose of stage 4 is to prepare and finalise an Aboriginal cultural heritage assessment report with input from registered Aboriginal parties. The draft ACHAR was sent to the registered Aboriginal parties on the 16th December 2020 and the review period ended on the 13th of January 2021. Only one acknowledgement of the report was received (refer to Appendix 5). After the review close date, attempts were made to contact the registered Aboriginal parties by phone to see if the RAPs had any comment to provide for the ACHAR. The Ulladulla LALC and Clive Freeman from Freeman&marx confirmed that they were satisfied with the final ACHAR report.

9 Aboriginal cultural significance assessment

9.1 Introduction to the assessment process

The Burra Charter defines cultural significance as meaning the *'aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups (Australia ICOMOS 2013).'*

The assessment process for this study is set out in the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010, the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011, and the Aboriginal cultural heritage consultation requirements for proponents 2010.

The NSW Heritage Management System includes three steps that are required for the management of heritage items. These steps include:

Investigate significance

Assess significance

Manage significance (NSW Heritage Office 2004).

The first stage of this ACHA was to investigate significance. This investigation process is defined in the ACHA methodology for the project. The investigations carried out at the study area in accordance with this methodology, includes the review of existing sites information, review of studies carried within the locality, Aboriginal knowledge holder inputs, review of the landscape context and existing models, predictive model, site survey, and test excavation program and results.

9.1.1 Social or Cultural Value

'Social or cultural value refers to the spiritual, traditional, historical or contemporary associations and attachments the place or area has for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them' (OEH 2011).

Clive Freeman from the Wreck Bay Community describes the social and cultural value of the place with this comment in his response to the methodology review with the following: *"This location is above an old campsite our family would visit. We have very strong connections to this area. The view to both Dithol and Bhewerre are of great significance. This Area holds a lot of stories connected to our family and the hills leading to the stringy bark forests were taught to us family to make the nets for king fish and bark canoes."*

9.1.2 Historic Significance

The Australia ICOMOS Burra Charter 1999 describes Historic Significance: *‘A place may have historic value because it has influenced, or has been influenced by, an historic figure, event, phase or activity. It may also have historic value as the site of an important event. For any given place, the significance will be greater where evidence of the association or event survives in situ, or where the settings are substantially intact, than where it has been changed or evidence does not survive. However, some events or associations may be so important that the place retains significance regardless of subsequent treatment.’*

The historical value of the site is evident from this comment by Clive Freeman from the Wreck Bay Community who responded to the methodology review with the following: *“This location is above an old campsite our family would visit. We have very strong connections to this area. The view to both Dithol and Bhewerre are of great significance. This Area holds a lot of stories connected to our family and the hills leading to the stringy bark forests were taught to us family to make the nets for king fish and bark canoes.”*

9.1.3 Aesthetic Significance

The Australia ICOMOS Burra Charter 1999 describes Aesthetic value as including aspects of ‘sensory perception for which criteria can and should be stated. Such criteria may include consideration of the form, scale, colour, texture and material of the fabric; the smells and sounds associated with the place and its use.’

The study area has been significantly modified from its original state including the removal of all vegetation from the site from the early grazing and farming activity followed by the extensive modification of the landscape associated with the construction of the former college and the associated sports fields. The study area is now considered to be of low aesthetic significance.

9.1.4 Scientific Significance

The Australia ICOMOS Burra Charter 1999 describes scientific significance as follows: *‘The scientific value of any given location will depend on the importance of the data that can be obtained from any archaeological material located, on its rarity, quality and on the degree to which this may contribute further substantial information to a scientific research process.’*

The study area is considered to be of low scientific significance. The test excavation has provided very little data. The raw material of the identified artefacts is common to the locality. One artefact is a quartz flake produced by bipolar reduction, a process commonly used for the production of quartz flakes. The other artefact is a broken flake which retains minimal features that could contribute to any meaningful analysis.

There is no visible evidence that the flakes have been used. To determine if they had been used, microscopic edge wear analysis would need to be undertaken however due to the small number of artefacts it would not provide sufficient data to contribute to the scientific significance of the archaeology nor would it provide substantial information to the scientific research process. No datable material was found in association with the artefacts, so it is not

possible to place the artefacts into an age context. The study area is considered to be of low scientific significance.

9.1.5 Educational Significance

The Australia ICOMOS Burra Charter 1999 describes educational significance: *'The educational value of any given location will depend on the importance of any archaeological material located, on its rarity, quality and the contribution this material can have on any educational process.'*

The study area is considered to be of low educational significance. The test excavation has provided very little data. The raw material of the identified artefacts is common to the locality. One artefact is a quartz flake produced by bipolar reduction, a process commonly used for the production of quartz flakes. The other artefact is a broken flake which retains minimal features that could contribute to any meaningful analysis. There is no visible evidence that the flakes have been used. No stratification was evident in the A horizon soils and no datable material was found in association with the artefacts so it is not possible to place the artefacts into an age context.

The archaeology has limited educational significance. The results affirm the present understanding of the archaeology of the South Coast lowlands and hinterland including that artefact distributions and sites may be found anywhere within the landscape but will generally be small and consist of low numbers of artefacts.

9.1.6 Representative significance

The Australia ICOMOS Burra Charter 1999 describes representative significance: *'The representative value of any given location will depend on rarity and quality of any archaeological material located and on the degree to which this representativeness may contribute further substantial information to an educational or scientific research process.'*

The study area is considered to be of low representative significance. The sites recorded during the test excavation are representative of sites in the region. The raw material and artefact types are represented at sites throughout the locality. The representativeness and the small amount of data from the test excavation program is not considered to contribute further substantial information to the education or scientific research processes.

9.1.7 Rarity

The study area is considered to be of low rarity significance. The results affirm the present understanding of the archaeology of the South Coast lowlands and hinterland including that artefact distributions and sites may be found anywhere within the landscape but will generally be small and consist of low numbers of artefacts. There is insufficient data and knowledge gained from the results of the test excavation to contribute to a further

understanding of the way of life, custom, process, land-use, function or design no longer practised.

9.1.8 Statement of Significance

The study identified two Aboriginal objects that were present as part of a disperse low density scatter in the A horizon soils that did not exhibit stratification. The artefact raw materials and types are a common occurrence within the locality. From the scientific, educational, representational and rarity assessment, the site is of low significance. Due to the small amount of information that can be gained from the site, it contributes very little additional information to our understanding of the site, locality and region. The aesthetic values of the site are of low significance due to the early farming and later development of the study area. The site has cultural and historical values due to a nearby former campsite and because of its views to important landscape features in the area, and due its association with cultural stories.

10 Proposed Activity and Impact Assessment

A summary of the history of the area of the study area is described in Section 3.2 European Land Use History. The proposed development and objectives are defined in Section 1.3 Location and Proposed Development. The proposed development will be assessed for approval during the early part of 2021 and site works will commence in 2021.

10.1 Assessing Harm

The proposed development includes the construction of a building block consisting of four homebases positioned in the location of the remaining potentially intact soils (test excavation location) (refer to Figure 13). The other buildings are located in positions where the soil is in a disturbed context and there are no surviving soil profiles. The construction will involve earthworks associated with the building construction and the provision of services and is expected to disturb the remaining A horizon soils in the area. This will also destroy the test pit locations from which the two artefacts were identified.

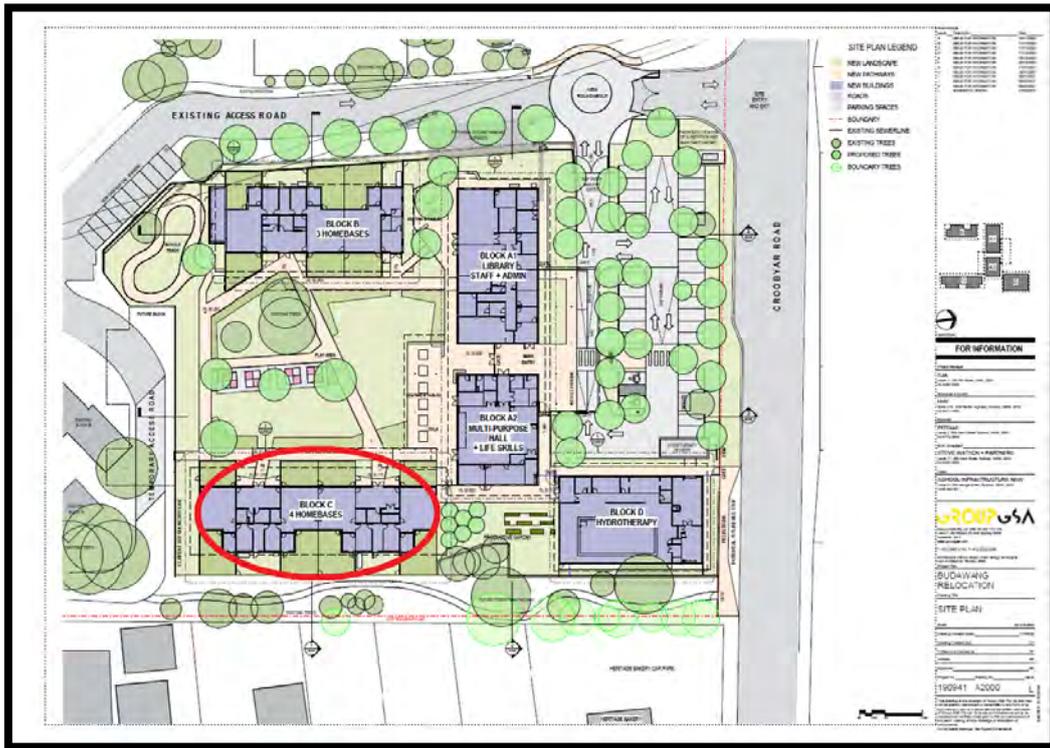


Figure 13: Red circled area where development will potentially impact upon surviving intact soil profiles.

Table 4 shows the harm that will occur to known sites. Direct harm to both artefact sites will occur as a result of the development. The remaining area of intact soil within the test excavation sample area is expected to be a continue of a disperse low density distribution of artefacts. This area will also be destroyed and any objects that may be present in this area will be directly harmed.

Site number	Location	Type of harm	Degree of harm	Consequence of harm
Pit A02	E 267505 N 6088294	Direct	Total	Total loss of value
Pit A05	E 267498 N 6088304	Direct	Total	Total loss of value

Table 4: Harm to known sites.

The aesthetic values of the study area have already been significantly impacted as a result of the historical use and development. The other cultural values of the study area are intangible values and include the views towards the significant landscape features in the area including both Dithol and Bhewerre, cultural stories, and the sites proximity to an old campsite on the creek below the study area (pers comm. Clive Freeman 2020).

10.2 Avoiding harm to Aboriginal heritage

Avoiding harm to the Aboriginal archaeological and cultural heritage sites through the design of the development is the preferred mitigation and management strategy. However the impacts from the proposed development as shown in Figure 13 will impact upon the sites of the two identified artefacts and any other unidentified objects that may be present in the undisturbed soils.

10.3 Management and mitigation of measures

The procedures for the storage and reburial of Aboriginal objects will be determined in consultation with the registered Aboriginal stakeholders, and the Schools Infrastructure NSW if it is proposed to rebury the artefacts within the school grounds. A proposal to rebury the artefacts at the southern end of the study area has been proposed to the RAPs.

10.4 Recommendations

These recommendations are provided on the basis of the recognition of the legal requirements and automatic statutory protection provided to Aboriginal 'objects' and 'places' under the terms of the National Parks and Wildlife Act of 1974 (as amended), and as outlined in the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW 2010).

The recommendations are:

The sites of the identified artefacts will be destroyed by the proposed development and as such the impacts to Aboriginal objects should be considered during the reviews of the SEARs documentation as part of the SSD approvals process. This assessment should take into account known and unknown Aboriginal objects within the study area;

Archaeological test excavation has been carried out within the study area in accordance with Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010), and Part 6 National Parks and Wildlife Act 1974. This has enabled an understanding and characterisation of the disperse distribution of artefacts within the surviving soil profiles and the archaeological significance and scientific value of the identified artefacts and site, and likely value of the remaining undisturbed landform. This information should be used as the basis for the assessment requirements of the SSD and SEARS;

If any unanticipated Aboriginal archaeological objects, sites or PAD are identified during the construction program within impact footprints, works should cease immediately, and notify Heritage NSW;



If any human remains are identified during the earthworks within the impact footprints works should cease immediately and the Police and NSW Heritage should be contacted.

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Appendices

Appendix 1 – Consultation Log



Stage 1 – Notification of Project Proposal and Registration of Interest

Identify Aboriginal people who may have an interest for the proposed project area

Organisation	Date sent	Date received	Response
Heritage NSW	Email 25/9/20	Email 6/10/20	List of Shoalhaven LGA Raps sent
Ulladulla Local Aboriginal Land Council	Email 25/9/20		
Office of the Registrar, <i>Aboriginal Land Rights Act 1983</i>	Email 25/9/20	Email 4/11/20	No registered Aboriginal owners
National Native Title Tribunal	Email 25/9/20	Email 29/9/20	Search results show freehold
Native Title Services Corporation Limited	Email 25/5/20	Email 1/10/20	The South Coast People nominate Paul McLeod
Shoalhaven City Council	Email 25/9/20	Email 28/10/20	Recommended the Ulladulla Local Aboriginal Land Council

Registration of Interest

Organisation	Date sent	Date received	Response
Badu (Murrin Clan/Peoples)	Email 6/10/20		No response
Barraby Cultural Services	Email 6/10/20	Email 7/10/20	Would like to register and be consulted
Batemans Bay Local Aboriginal Land Council	Email 6/10/20		No response
Biamanga (Murrin Clan/Peoples)	Email 6/10/20		No response
Bilinga (Murrin Clan/Peoples)	Email 6/10/20		No response
Noel Butler	Email 6/10/20		No response
Darryl Caines	Email 6/10/20		No response
Gary Caines	Email 6/10/20		No response
Ronald Carberry	Post 7/10/20		No response
Cullendulla (Murrin Clan/Peoples)	Email 6/10/20		No response
Darug Land Observations	Email 6/10/20		No response
Dharug (Murrin Clan/Peoples)	Email 6/10/20		No response
Eora Heritage Group	Email 6/10/20		No response
Clive Freeman	Email 6/10/20	Email 6/10/20	Would like to register an interest
Gadhu Dreaming	Email 6/10/20		No response

Goobah Development PTY LTD (Murrin Clan/Peoples)	Email 6/10/20		No response
Gundungurra Tribal Technical Services	Email 6/10/20		No response
Gumaraa	Email 6/10/20		No response
Gundungurra Tribal Technical Services	Email 6/10/20		No response
Gundungurra Tribal Technical Services	Email 6/10/20		No response
Gundungurra Tribal Technical Services	Email 6/10/20		No response
Gundungurra Tribal Technical Services	Email 6/10/20		No response
Gundungurra Tribal Technical Services	Email 6/10/20		No response
Gundungurra Tribal Technical Services	Email 6/10/20		No response
Gundungurra Tribal Technical Services	Email 6/10/20		No response
Gunyuu (Murrin Clan/Peoples)	Email 6/10/20		No response
Guunamaa Dreamin Sites and Surveying	Email 6/10/20	Email 9/10/20	Would like to be involved in fieldwork for project
Jerringong (Murrin Clan/Peoples)	Email 6/10/20		No response
Jerrinja Local Aboriginal Land Council	Email 6/10/20		No response
Karrial (Murrin Clan/Peoples)	Email 7/10/20		No response
Minnamunnung	Email 6/10/20	Email 7/10/20	Would like to register an expression of interest
Munyunga (Murrin Clan/Peoples)	Email 6/10/20		No response

Murramarang (Murrin Clan/Peoples)	Email 6/10/20		No response
Murra Bidgee Mullangari Aboriginal Corporation	Email 6/10/20		No response
Murrumbul (Murrin Clan/Peoples)	Email 6/10/20		No response
Nowra Local Aboriginal Land Council	Email 6/10/20		No response
Nundagurri (Murrin Clan/Peoples)	Email 6/10/20		No response
Paul McLeod (South Coast People)	Email 6/10/20	Email 7/10/20	Would like to be considered for site work, is an Elder and Native title applicant
Pemulwuy (Murrin Clan/Peoples)	Email 6/10/20		No response
Shoalhaven Elders and Friends Organisation	Post 7/10/20		No response
South Coast NSW Aboriginal Elders	Email 6/10/20		No response
South West Rocks Corporation	Email 7/10/20		No response
Thoorga Nura	Email 6/10/20		No response
Three Ducks Dreaming Surveying and Consulting	Email 6/10/20		No response
Tungai Tonghi	Email 6/10/20	Email 7/10/20	Would like to put in an expression of interest
Leanne Tungai	Email 6/10/20	Email 6/10/20	Please register my group

Ulladulla Local Aboriginal Land Council	Email 6/10/20	Email 7/10/20	Holds an interest and will require representation on site during any works or surveys
Walbunja (Murrin Clan/Peoples)	Email 6/10/20		No response
Walgalu (Murrin Clan/Peoples)	Email 6/10/20		No response
Warra Bingi Nunda Gurri	Email 6/10/20		No response
Gayle Watts	Email 6/10/20		No response
Noel Webster	Email 6/10/20		No response
Wingikara (Murrin Clan/Peoples)	Email 6/10/20		No response
Wullung (Murrin Clan/Peoples)	Email 6/10/20		No response
Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation	Email 6/10/20	Email 6/10/20	Registered an interest in assisting and determining Aboriginal Heritage
Yurrandaali Cultural Services	Email 6/10/20	Email 7/10/20	Would like to register and be consulted



Stage 2 – Presentation of information about the proposed project

Provide registered Aboriginal parties with information

Organisation	Date sent	Date received	Response
Barraby Cultural Services	Email 20/10/20		No response
Clive Freeman	Email 20/10/20		No response
Guunamaa Dreamin Sites and Surveying	Email 20/10/20		No response
Leanne Tungai	Email 20/10/20	Email 20/10/20	Received with thanks
Minnamunnung	Email 20/10/20	Email 20/10/20	Received with thanks
Paul McLeod	Email 20/10/20		No response
Tungai Tonghi	Email 20/10/20		No response
Ulladulla Local Aboriginal Land Council	Email 20/10/20		No response
Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation	Email 20/10/20		No response
Yurrandaali Cultural Services	Email 20/10/20		No response



Example letter of invitation sent to registered Aboriginal stakeholders to visit the site.

FW: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects - Open day - Message (HTML)

File Message Help Tell me what you want to do

Ignore Delete Archive Reply Reply All Forward Meeting Responses To Manager Done Team Email Done Reply & Delete Create New Move OneNote Actions Move Assign Mark Categorize Follow Up Translate Related Select Read Aloud Zoom Insights

FW: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects - Open day

 Danielle Mitchell
To: Will Moon

prohibited. If you received this in error, please contact the sender and delete the material from any computer. Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of the company.

 Please consider the environment before printing this e-mail.

From: Danielle Mitchell
Sent: Wednesday, 21 October 2020 12:45 PM
To: Paul James Mcleod <poppymac58@gmail.com>
Subject: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects - Open day

Dear Paul,

I am writing to invite you to attend the site on Wednesday October 28th at 10am. This is an opportunity to learn more about the project and ask any questions you may have. Please note that the site visit is voluntary and not paid.

If you would like to attend, please reply to this email by close of business Monday October 26th.

Kind regards

Dani Mitchell

 Puliyapang
puliyapang.com.au



Dani Mitchell | Senior Archaeologist
M +61 466 676 510
E Danielle.mitchell@puliyapang.com.au | Level 2, 2 Burbank Place, Norwest NSW 2153

This email and any attachments are confidential and may be legally privileged (in which case neither is waived nor lost by mistaken delivery). If you are not the intended recipient of this message (you are hereby notified that any use, review, retransmission, dissemination, distribution, reproduction or any action taken in reliance upon this message is expressly prohibited. If you received this in error, please contact the sender and delete the material from any computer. Any views expressed in this message are those of the individual sender and may not necessarily reflect the views of the company.

 Please consider the environment before printing this e-mail.



Stage 3 – Gathering information about cultural significance

Step 1 - Project methodology, including test excavation strategy and survey report

Organisation	Date sent	Date received	Response
Barraby Cultural Services	Email 3/11/20		No response
Clive Freeman	Email 3/11/20	Email 4/11/20	Refer to appendix 4
Guunamaa Dreamin Sites and Surveying	Email 3/11/20		No response
Leanne Tungai	Email 3/11/20		No response
Minnamunning	Email 3/11/20	Email 3/11/20	Received with thanks
Paul McLeod	Email 3/11/20		No response
Tungai Tonghi	Email 3/11/20		No response
Ulladulla Local Aboriginal Land Council	Email 3/11/20		No response
Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation	Email 3/11/20		No response
Yurrandaali Cultural Services	Email 3/11/20		No response

Stage 4 – Review of draft report

Organisation	Date sent	Date received	Response
Barraby Cultural Services	Email 16/12/2021		No response
Clive Freeman	Email 16/12/2021		No response. Verbal acceptance provided over the phone in January 2021.
Guunamaa Dreamin Sites and Surveying	Email 16/12/2021		No response
Leanne Tungai	Email 16/12/2021		No response
Minnamunnung	Email 16/12/2021		No response
Paul McLeod	Email 16/12/2021		No response
Tungai Tonghi	Email 16/12/2021		No response
Ulladulla Local Aboriginal Land Council	Email 16/12/2021		No response. Verbal acceptance provided over the phone in January 2021.



Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation	Email 16/12/2021	18/12/2021	Response: <i>"Thanks for the update."</i>
Yurrandaali Cultural Services	Email 16/12/2021		No response



Appendix 2 – Register searches results and public notice



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

24/09/2020

Heritage NSW

heritagemailbox@environment.nsw.gov.au

To whom it may concern

Tocomwall Pty Ltd is undertaking an Aboriginal Cultural Heritage Assessment in accordance with the DECCW (DPIE) 2010 Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW for a proposed development at lot 200 DP 1192140, the former Anglican School, Croobyar Rd, Milton NSW within the Shoalhaven LGA. The assessment is being undertaken on behalf of Budawang SSD, School Infrastructure Projects NSW, Level 8, 259 George St, Sydney, NSW 2000.

In accordance with section 4.1.2 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010a), Tocomwall/School Infrastructure Projects is seeking to identify the names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places at the site and requests the names and contact details of Aboriginal people to assist the proposed applicant in the preparation of an application for an AHIP. If you require any further information, please do not hesitate to contact me on 0466 676 510. Please provide the details within 7 days of receipt to danielle.mitchell@puliypang.com.au or to the Tocomwall postal address shown on this letter. Thank you.

Yours Sincerely,

D. Mitchell

Dani Mitchell

Archaeologist

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

24/09/2020

Ulladulla Local Aboriginal Land Council

Leanne.ulalc@gmail.com

To whom it may concern

Tocomwall Pty Ltd is undertaking an Aboriginal Cultural Heritage Assessment in accordance with the DECCW (DPIE) 2010 Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW for a proposed development at lot 200 DP 1192140, the former Anglican School, Croobyar Rd, Milton NSW within the Shoalhaven LGA. The assessment is being undertaken on behalf of Budawang SSD, School Infrastructure Projects NSW, Level 8, 259 George St, Sydney, NSW 2000.

In accordance with section 4.1.2 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010a), Tocomwall/School Infrastructure Projects is seeking to identify the names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places at the site and requests the names and contact details of the Aboriginal people from your organisation to assist the proposed applicant in the preparation of an application for an AHIP. If you require any further information, please do not hesitate to contact me on 0466 676 510. Please provide the details within 7 days of receipt to danielle.mitchell@puliypang.com.au or to the Tocomwall postal address shown on this letter. Thank you.

Yours Sincerely,

D. Mitchell

Dani Mitchell

Archaeologist

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

24/09/2020

Office of the Registrar

PO Box 5068
Parramatta NSW 2124

To whom it may concern

Tocomwall Pty Ltd is undertaking an Aboriginal Cultural Heritage Assessment in accordance with the DECCW (DPIE) 2010 Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW for a proposed development at lot 200 DP 1192140, the former Anglican School, Croobyar Rd, Milton NSW within the Shoalhaven LGA. The assessment is being undertaken on behalf of School Infrastructure Projects NSW, Level 8, 259 George St, Sydney, NSW 2000.

In accordance with section 4.1.2 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010a), Tocomwall/School Infrastructure Projects is seeking to identify the names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places at the site and requests the names and contact details of any Registered Aboriginal Owners to assist the proposed applicant in the preparation of an application for an AHIP. If you require any further information, please do not hesitate to contact me on 0466 676 510.

Please provide the details within 7 days of receipt to danielle.mitchell@puliypang.com.au or to the Tocomwall postal address shown on this letter. Thank you.

Yours Sincerely,

D. Mitchell

Dani Mitchell

Archaeologist

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future

Request for Spatial Search of Tribunal Registers

1: Your details

Your name:	<i>Danielle Mitchell</i>		
Your company:	<i>Tocomwall</i>		
E-mail address:	<i>dinodani@tpg.com.au</i>	Phone:	<i>0466676510</i>
Your reference:	<i>Budawang SSD</i>	Your state:	<i>New South Wales</i>
<input checked="" type="checkbox"/>	<i>I have read and acknowledge the terms and conditions on the next page.</i>		

2: Areas to be searched

Jurisdiction to be searched:	<i>New South Wales</i>	Tenure to be searched:	<i>Select one.</i>
------------------------------	------------------------	------------------------	--------------------

Parcel or tenement identifiers (add up to 20 separate identifiers). **Please see over for parcel identifiers.**

Parcel 1:	<i>Click or tap here to enter text.</i>	Parcel 2:	<i>Click or tap here to enter text.</i>
Parcel 3:	<i>Click or tap here to enter text.</i>	Parcel 4:	<i>Click or tap here to enter text.</i>
Parcel 5:	<i>Click or tap here to enter text.</i>	Parcel 6:	<i>Click or tap here to enter text.</i>
Parcel 7:	<i>Click or tap here to enter text.</i>	Parcel 8:	<i>Click or tap here to enter text.</i>
Parcel 9:	<i>Click or tap here to enter text.</i>	Parcel 10:	<i>Click or tap here to enter text.</i>
Parcel 11:	<i>Click or tap here to enter text.</i>	Parcel 12:	<i>Click or tap here to enter text.</i>
Parcel 13:	<i>Click or tap here to enter text.</i>	Parcel 14:	<i>Click or tap here to enter text.</i>
Parcel 15:	<i>Click or tap here to enter text.</i>	Parcel 16:	<i>Click or tap here to enter text.</i>
Parcel 17:	<i>Click or tap here to enter text.</i>	Parcel 18:	<i>Click or tap here to enter text.</i>
Parcel 19:	<i>Click or tap here to enter text.</i>	Parcel 20:	<i>Click or tap here to enter text.</i>

If your search area is not a parcel or mining or petroleum tenement, you can enter other tenure or administrative regions here (e.g. local government area, townsite or county). Please provide as much detail as you can.

<i>Lot 200 on DP 1192140 Croobyar Rd Milton NSW. LGA Shoalhaven.</i>
--

E-mail the completed form to GeospatialSearch@NNTT.gov.au

Parcel Identifiers

In most jurisdictions please identify parcels using lot on plan, or lot/section/plan as appropriate. The NNTT is generally not able to identify parcels using land title information. Where possible, the NNTT uses the terminology and formatting of unique identifiers used in each state to uniquely identify a land parcel. More details are below:

1. **Lot on plan.** Use for Western Australia and Queensland.
2. **Lot/Section/Plan.** Use for New South Wales.
3. **LAIKEY.** Use for the Northern Territory. The laiskey is a unique identifier for each parcel comprised of the location code, LTO code (derived from the survey plan) where applicable and the parcel number.
4. **Parcel ID** – Use for South Australia. Concatenation of Parcel Type, Parcel, Plan Type and Plan.
5. **SPI (Standard Parcel Identifier)** – Use for Victoria.

Terms and Conditions

1. Specify only one jurisdiction (e.g. Queensland) and one type of tenure (e.g. mining tenement) per form. You can add up to 20 separate tenements or parcels per search request. For more than 20 parcels or tenements please submit additional search requests or contact GeospatialSearch@NNTT.gov.au to discuss your requirements.

Note: if your area of interest cannot be clearly identified from the search form, or is not held in NNTT datasets, we may instead provide search results for a surrounding local government area, or other suitable regional area.

2. Freehold land.

Under the Native Title Act 1993 (Cth), the valid grant of a freehold estate (other than certain types of Aboriginal and Torres Strait Islander land) on or before 23 December 1996 is known as a 'previous exclusive possession act'. This means that native title has been extinguished over the area. Native title claimants are not allowed to include land and waters covered by previous exclusive possession acts in their applications; therefore they would normally exclude freehold areas. A native title application may, however, be made over freehold land on the basis that freehold was invalidly granted, but the chances of this happening are very low.

3. Cultural Heritage in NSW.

The National Native Title Tribunal has undertaken steps to remove itself from the formal list of sources for information about indigenous groups in development areas. The existence or otherwise of native title is quite separate to any matters relating to Aboriginal cultural heritage. Information on native title claims, native title determinations and Indigenous Land Use Agreements is available on the Tribunal's website.

4. Spatial searches rely on data obtained from the relevant custodian. Whilst efforts are taken to update such datasets on a regular basis, the collection and interpretation of such datasets may be influenced by a number of factors that can impact of the completeness and accuracy of your search results.

Disclaimer

While the National Native Title Tribunal (NNTT) and the Native Title Registrar (Registrar) have exercised due care in ensuring the accuracy of the information provided, it is provided for general information only and on the understanding that neither the NNTT, the Registrar nor the Commonwealth of Australia is providing professional advice. Appropriate professional advice relevant to your circumstances should be sought rather than relying on the information provided. In addition, you must exercise your own judgment and carefully evaluate the information provided for accuracy, currency, completeness and relevance for the purpose for which it is to be used.

The information provided is often supplied by, or based on, data and information from external sources, therefore the NNTT and Registrar cannot guarantee that the information is accurate or up-to-date.

The NNTT and Registrar expressly disclaim any liability arising from the use of this information.

This information should not be relied upon in relation to any matters associated with cultural heritage.



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

24/09/2020

Native Title Services Corporation Limited

PO Box 2105
Strawberry Hills NSW 2012
Ph: 02 9310 3188

To whom it may concern

Tocomwall Pty Ltd is undertaking an Aboriginal Cultural Heritage Assessment in accordance with the DECCW (DPIE) 2010 Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW for a proposed development at Lot 200 DP 1192140, the former Anglican School, Croobyar Rd, Milton NSW within the Shoalhaven LGA. The assessment is being undertaken on behalf of Budawang SSD, School Infrastructure Projects NSW, Level 8, 259 George St, Sydney, NSW 2000.

In accordance with section 4.1.2 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010a), Tocomwall/School Infrastructure Projects is seeking to identify the names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places at the site and requests the names and contact details of any Native Title Holders to assist the proposed applicant in the preparation of an application for an AHIP. If you require any further information, please do not hesitate to contact me on 0466 676 510. Please provide the details within 7 days of receipt to danielle.mitchell@puliypang.com.au or to the Tocomwall postal address shown on this letter. Thank you.

Yours Sincerely,

D. Mitchell

Dani Mitchell

Archaeologist

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

24/09/2020

Shoalhaven City Council

PO Box 42
Nowra NSW 2541
Ph: 02 4429 3111

To whom it may concern

Tocomwall Pty Ltd is undertaking an Aboriginal Cultural Heritage Assessment in accordance with the DECCW (DPIE) 2010 Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW for a proposed development at Lot 200 DP 1192140, the former Anglican School, Croobyar Rd, Milton NSW within the Shoalhaven LGA. The assessment is being undertaken on behalf of Budawang SSD, School Infrastructure Projects NSW, Level 8, 259 George St, Sydney, NSW 2000.

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Yours Sincerely,

D. Mitchell

Dani Mitchell

Archaeologist

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future

RE: SR20/986 - Geospatial search -SR20/986



Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>
To: Danielle Mitchell

Reply Reply All Forward

Tue 29/09/2020 3:38 PM

UNCLASSIFIED

Native title search – NSW Parcel– Lot 200 on DP1192140
Your ref: Budawang SSD - Our ref: SR20/986

Dear Danielle Mitchell,

Thank you for your search request received on 25 September 2020 in relation to the above area, please find your results below.

Search Results

The results provided are based on the information you supplied and are derived from a search of the following Tribunal databases:

- Schedule of Native Title Determination Applications
- Register of Native Title Claims
- Native Title Determinations
- Indigenous Land Use Agreements (Registered and notified)

Cadastral Data as at: 01/07/2020

Parcel ID	Feature Area SqKm	Tenure	NNTT file number	Name	Category	Overlap Area SqKm	Percent Selected Feature
200//DP1192140	0.0775	FREEHOLD	NC2017/003	South Coast People	Applications (Schedule)	0.0775	100.00%
200//DP1192140	0.0775	FREEHOLD	NC2017/003	South Coast People	Applications (RNTC)	0.0775	100.00%

For more information about the Tribunal's registers or to search the registers yourself and obtain copies of relevant register extracts, please visit our [website](#).

Information on native title claims and freehold land can also be found on the Tribunal's website here: [Native title claims and freehold land](#).

Please note: There may be a delay between a native title determination application being lodged in the Federal Court and its transfer to the Tribunal. As a result, some native title determination applications recently filed with the Federal Court may not appear on the Tribunal's databases.

The search results are based on analysis against external boundaries of applications only. Native title applications commonly contain exclusions clauses which remove areas from within the external boundary. To determine whether the areas described are in fact subject to claim, you need to refer to the "Area covered by claim" section of the relevant Register Extract or Schedule Extract and any maps attached.

Search results and the existence of native title

Please note that the enclosed information from the Register of Native Title Claims and/or the Schedule of Applications is **not** confirmation of the existence of native title in this area. This cannot be confirmed until the Federal Court makes a determination that native title does or does not exist in relation to the area. Such determinations are registered on the National Native Title Register.

The Tribunal accepts no liability for reliance placed on enclosed information

The enclosed information has been provided in good faith. Use of this information is at your sole risk. The National Native Title Tribunal makes no representation, either express or implied, as to the accuracy or suitability of the information enclosed for any particular purpose and accepts no liability for use of the information or reliance placed on it.

If you have any further queries, please do not hesitate to contact us on the free call number 1800 640 501.

Regards,

Geospatial Searches

National Native Title Tribunal | Perth

Email: GeospatialSearch@nntt.gov.au | www.nntt.gov.au



RE: Lot 200 DP 1192140 Budawang SSD, Milton NSW, School infrastructure Projects



Matilda Vaughan <mvaughan@ntscorp.com.au>

To Danielle Mitchell

Cc Sandy Chalmers; Isobel Brinin

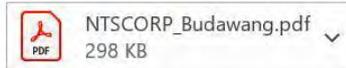
Reply

Reply All

Forward



Thu 1/10/2020 12:40 PM



Hi Danielle,

We refer to your letter of 24 September 2020, **attached**.
The South Coast People nominate Paul McLeod,

Paul McLeod
Ph: 0467 985 472; 02 4442 1003
poppymac58@gmail.com

Kind regards,

Tilly Vaughan | Paralegal

t 61 2 9310 3188 | f 61 2 9310 4177

e mvaughan@ntscorp.com.au | w www.ntscorp.com.au

Level 1, 44-70 Rosehill Street, Redfern, NSW 2016 Australia



NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People of the Dharug Nation. We also acknowledge and pay our respect to their Elders past and present.

NTSCORP is committed to supporting local Aboriginal businesses where possible through the purchase of goods and services.

Our reference: DOC20/810293

Dani Mitchell
Archaeologist
Tocomwall Pty Ltd
P.O Box 76 Caringbah
NSW 1495

Dear Dani,

Thank you for your letter dated 24 September 2020 to Heritage within NSW the Department of Premier and Cabinet (DPC) regarding obtaining a list of the Aboriginal stakeholders that may have an interest in an Aboriginal Cultural Heritage Assessment for a proposed development at lot 200 DP 1192140, the former Anglican School, Croobyar Rd, Milton NSW.

Before making an application for the issue of an Aboriginal Heritage Impact Permit, the applicant must carry out an Aboriginal community consultation process in accordance with the *National Parks and Wildlife Regulation 2019* and completed to the stage described in subclause 60C.

Please find attached the list of Aboriginal stakeholders known to Heritage NSW that may have an interest in the project. Heritage NSW's list of regional stakeholders is a list of groups, organisations or individuals who may hold cultural knowledge relevant to a proposal in a region. You should contact the stakeholders who have indicated an interest in the Local Government Area (LGA) relevant to your project. Contact details are correct as at the time of registration. Consultation with Aboriginal people should not be confused with employment. Inclusion on the Heritage NSW's list is not an automatic right to employment. It is the decision of a proponent on who they choose to engage to deliver services based on a range of considerations including skills, relevant experience, and WHS considerations. To be clear, the proponent is under no obligation to employ Aboriginal people registered for consultation.

Further, receipt of this information does not remove the requirement of a proponent/consultant to advertise in local print media and contact other bodies seeking interested Aboriginal parties. Consultation with Aboriginal stakeholders must be in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* which can be found on the Heritage NSW public website by accessing the following link:

<https://www.heritage.nsw.gov.au/assets/Uploads/files/Aboriginal-Cultural-Heritage-Consultation-Requirements-for-Proponents.pdf>

Level 6, 10 Valentine Ave Parramatta NSW
2150 ■ Locked Bag 5020 Parramatta NSW
2124
P: 02 9873 8500 ■ E:
heritagemailbox@environment.nsw.gov.au



If you wish to discuss any of the above matters further please email heritagemailbox@environment.nsw.gov.au

Please note that subclause 60C (4) of the NPW Reg 2019 requires that the notification of potential stakeholders by letter and newspaper **must include the name and contact details of the proponent**. Any consultation undertaken that does not comply with the consultation requirements may not be considered sufficient to support an application for an AHIP. In this case Heritage NSW may require a new consultation process be undertaken in accordance with the consultation requirements before issuing an AHIP.

Yours sincerely

Barry Gunther
Aboriginal Heritage Planning Officer
Aboriginal Cultural Heritage Regulation - South
Heritage NSW



Proposed development at Lot 200 DP 1192140, the former Anglican School, Croobyar Rd, Milton NSW



Margaret Simoes <Margaret.Simoes@shoalhaven.nsw.gov.au>

To Danielle Mitchell

Cc admin@ulladullalalc.com.au

Reply Reply All Forward

Wed 28/10/2020 3:51 PM

Danielle Mitchell
Archaeologist
No. D20/434071
Tocomwall Pty Ltd

Dear Ms Mitchell

Thank you for your letter dated 24/9/20 seeking information to identify Aboriginal Cultural knowledge holders relevant to the site to assist the proposed applicant in the preparation of the an AHIP application. Sincere apologies with the late reply to your correspondence, I have only returned to work and following up on correspondence received in my absence.

The proposed development area is within the Ulladulla Local Aboriginal Land.

Mr Shane Carriage, CEO
Ulladulla Local Aboriginal Land Council
66 Deering Street Ulludulla NSW 2539
Telephone: 4455 5883
Email: admin@ulladullalalc.com.au

I am sure that the Ulladulla Local Aboriginal Land Council will be able to assist in identifying local Aboriginal knowledge holders relevant to this project location.

Regards

Margaret Simoes

Aboriginal Community Development Officer
Shoalhaven City Council

02 4429 3440 | 0412 254 072
Bridge Rd (PO Box 42) Nowra NSW 2541
margaret.simoes@shoalhaven.nsw.gov.au

RESPECT | INTEGRITY | ADAPTABILITY | COLLABORATION



I acknowledge the traditional owners and custodians of country and their continuing connection to the land, culture and community. I pay my respect to Elders past, present and future.

04 November 2020

By email: danielle.mitchell@puliypang.com.au

Dani Mitchell
Tocomwall Pty Ltd
PO Box 76
CARINGBAH NSW 1495

Dear Dani,

Request - Search for Registered Aboriginal Owners

We refer to your letter dated 24 September 2020 seeking the identification of Aboriginal organisations and people who may have an interest in the proposed development at lot 200 DP 1192140, the former Anglican School, Croobyar Rd, Milton NSW.

Under Section 170 of the Aboriginal Land Rights Act 1983 the Office of the Registrar is required to maintain the Register of Aboriginal Owners (RAO). A search of the RAO has shown that there are currently no Registered Aboriginal Owners in the project area.

We suggest you contact the Ulladulla Local Aboriginal Land Council on (02) 4455 5883 or via email – admin@ulladullalalc.com.au as they may wish to participate.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Rachel Rewiri".

Rachel Rewiri
Project Officer
Office of the Registrar, Aboriginal Land Rights Act 1983

**EXPRESSION OF INTEREST
Lot 200 in D.P. 1192140, Croobyar Rd,
Milton**

Aboriginal cultural heritage consultation requirements for proponents 2010

Tocomwall Pty Ltd is undertaking an Aboriginal Cultural Heritage Assessment in accordance with the DPIE. 2010 Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW on behalf of the proponent of School Infrastructure Projects NSW, Level 8, 259 George St, Sydney, NSW 2000, for a proposed development at Lot 200 in D.P. 1192140, Croobyar Rd, Milton, within the Shoalhaven LGA. Tocomwall Pty Ltd invites registration of interest from Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project, that may be subject to an application for an AHIP, to register an interest in a process of community consultation with the applicant.

Aboriginal people registering an interest in the community consultation process will have their details forwarded to Heritage NSW, and the Ulladulla LALC unless they specify that they do not want their details released.

Please register your interest in the project by the closing date of 15th of October 2020.

Registrations should be sent to:

William Moon

Tocomwall Pty Ltd

PO Box 76

Caringbah NSW 1495

Email: william@tocomwall.com.au

30/09/2020 - Public Notices

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
58-1-0343	Burrill lake site 29	AGD	56	266300	6081480	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
58-1-0345	Burrill lake site 31	AGD	56	264700	6081800	Open site	Valid	Artefact : -	Open Camp Site	1378
	Contact									
58-1-0346	Burrill lake site 32	AGD	56	265000	6081900	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
58-1-0347	Burrill lake site 33	AGD	56	266680	6081710	Closed site	Valid	Artefact : -	Shelter with Deposit	1378,103363
	Contact									
58-1-0348	Burrill lake site 34	AGD	56	266700	6081780	Open site	Valid	Shell : -, Artefact : -	Midden	1378,98658,103363
	Contact									
58-1-0349	Burrill lake site 35	AGD	56	266700	6081840	Open site	Valid	Shell : -, Artefact : -	Midden	1378,98658,103363
	Contact									
58-1-0350	Burrill lake site 36	AGD	56	266600	6081890	Open site	Valid	Shell : -, Artefact : -	Midden	1378,98658,103363
	Contact									
58-1-0351	Burrill lake site 37	AGD	56	266520	6081900	Open site	Valid	Shell : -, Artefact : -	Midden	1378,103363
	Contact									
58-1-0031	Milton;	AGD	56	266298	6086962	Open site	Valid	Modified Tree (Carved or Scarred) : -	Carved Tree	
	Contact									
58-1-0352	Burrill lake site 40	AGD	56	266280	6081980	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
58-1-0353	Burrill lake site 38	AGD	56	266440	6081920	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
58-1-0354	Burrill lake site 39	AGD	56	266380	6081970	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
58-1-0355	Burrill lake site 41	AGD	56	266260	6081980	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
58-1-0356	Burrill lake site 42	AGD	56	265880	6082000	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
58-1-0357	Burrill lake site 43	AGD	56	265840	6082200	Open site	Valid	Artefact : -, Shell : -	Midden	1378,99058
	Contact									

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SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
58-1-0358	Burrill lake site 44	AGD	56	266020	6082580	Open site	Valid	Shell : -, Artefact : -	Midden,Open Camp Site	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0359	Burrill lake site 45	AGD	56	266320	6082940	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0361	Burrill lake site 48	AGD	56	266680	6083960	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0362	Burrill lake site 47	AGD	56	266600	6083600	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0364	Burrill lake site 58	AGD	56	266640	6082880	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0365	Burrill lake site 59	AGD	56	266600	6082640	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0366	Burrill lake site 60	AGD	56	266660	6082610	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0367	Burrill lake site 64	AGD	56	266240	6083200	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0368	Burrill lake isolated find I	AGD	56	264720	6082200	Open site	Valid	Artefact : -	Isolated Find	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0369	Burrill lake isolated find_J	AGD	56	265980	6082900	Open site	Valid	Artefact : -	Isolated Find	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0712	MUB1	AGD	56	268800	6081810	Open site	Valid	Modified Tree (Carved or Scarred) :	Scarred Tree	
	Contact		Recorders	Kerry Navin,Mr.Kelvin Officer				Permits		
58-1-0713	MUB2	AGD	56	268590	6082180	Open site	Valid	Artefact : -	Open Camp Site	
	Contact		Recorders	Kerry Navin,Mr.Kelvin Officer				Permits		
58-1-0282	Burrill lake Site 51	AGD	56	267000	6084100	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0283	Burrill lake site 52	AGD	56	267010	6084090	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact		Recorders	Mr.D White				Permits		
58-1-0285	Burrill lake site 54	AGD	56	266900	6082820	Open site	Valid	Shell : -, Artefact : -	Midden	1378,97561
	Contact		Recorders	Mr.D White				Permits		
58-1-0286	Burrill lake site 55	AGD	56	267000	6082780	Open site	Valid	Shell : -, Artefact : -	Midden	1378,97561
	Contact		Recorders	Mr.D White				Permits		

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SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
58-1-0287	Burrill lake site 57	AGD	56	266800	6083000	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
	Recorders			Mr.D White						
58-1-0709	MUB3	AGD	56	268540	6082990	Open site	Valid	Modified Tree (Carved or Scarred) :	Scarred Tree	
	Contact									
	Recorders			Kerry Navin,Mr.Kelvin Officer						
58-1-0293	Burrill lake site 61	AGD	56	266800	6082600	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
	Recorders			Mr.D White						
58-1-0298	Burrill lake site 56	AGD	56	266990	6082800	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
	Recorders			Mr.D White						
58-1-0299	None Specified	AGD	56	266940	6084100	Open site	Valid	Artefact : -	Open Camp Site	
	Contact									
	Recorders			Mr.D White						
58-1-0635	Site 3;	AGD	56	265370	6085720	Open site	Valid	Artefact : -	Open Camp Site	
	Contact									
	Recorders			Doctor.Tim Stone						
58-1-0638	Site 4;	AGD	56	265620	6086550	Open site	Valid	Artefact : -	Open Camp Site	
	Contact									
	Recorders			Doctor.Tim Stone						
58-1-0639	Site 5;	AGD	56	269100	6089900	Open site	Valid	Artefact : -	Open Camp Site	
	Contact									
	Recorders			Doctor.Tim Stone						
58-1-0642	Burrill L. Shelter 4;	AGD	56	265940	6082120	Closed site	Valid	Artefact : -	Shelter with Deposit	99058
	Contact									
	Recorders			Philip Boot						
58-1-0643	Racecourse Creek 2;	AGD	56	269600	6088390	Open site	Valid	Modified Tree (Carved or Scarred) :	Scarred Tree	
	Contact									
	Recorders			Mr.Kelvin Officer						
58-1-0644	Racecourse Creek 1;	AGD	56	269150	6083660	Open site	Valid	Modified Tree (Carved or Scarred) :	Scarred Tree	
	Contact									
	Recorders			Mr.Kelvin Officer						
58-1-0078	Bannisters Point;Mollymook;	AGD	56	270116	6088137	Open site	Valid	Stone Quarry : -, Artefact : -	Quarry	97561
	Contact									
	Recorders			ASRSYS						
58-1-0026	Narrawalle Inlet;Conjola Beach;	AGD	56	270337	6090794	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact									
	Recorders			Australian Museum						
58-1-0027	Conjola Beach;	AGD	56	270933	6093002	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact									
	Recorders			Australian Museum						
58-1-0830	CS1	AGD	56	270050	6093840	Open site	Valid	Artefact : -		97560,99719

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SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	Contact	Recorders						Permits		
58-1-0831	CS2	AGD	56	268910	6094020	Open site	Valid	Artefact : -		97560,99719
	Contact	Recorders						Permits		
58-1-0929	MUPHST	AGD	56	268490	6086810	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	Contact	Recorders						Permits	1612	
58-1-0934	NW3 - Isolated Find	AGD	56	269211	6089386	Open site	Valid	Potential Archaeological Deposit (PAD) : 0		98417
	Contact	Recorders						Permits	1727,2286	
58-1-0935	NW5 (PADNW1)	AGD	56	269200	6089500	Open site	Valid	Potential Archaeological Deposit (PAD) : -, Artefact : 129		98417,99154
	Contact	Recorders						Permits	2286	
58-1-0641	IF 2;	AGD	56	267870	6091570	Open site	Valid	Artefact : -	Isolated Find	
	Contact	Recorders						Permits		
58-1-0363	Burrill lake site 49	AGD	56	266720	6084000	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact	Recorders						Permits		
58-1-0727	Blocks 6 & 7	AGD	56	270550	6084000	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-1-0728	Narrawallee	AGD	56	269700	6089800	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-1-0932	NW3	AGD	56	269211	6089386	Open site	Valid	Artefact : 1		98417,99154
	Contact	Recorders						Permits	2286	
58-1-0930	NW1	AGD	56	269320	6089325	Open site	Valid	Artefact : 7		98417
	Contact	Recorders						Permits	2286	
58-1-0931	NW2	AGD	56	269287	6089110	Open site	Valid	Artefact : 1		98417
	Contact	Recorders						Permits	2286	
58-1-0968	PAD Croobyar Creek CCPHS	AGD	56	266350	6090100	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		99599,99715
	Contact	Recorders						Permits	2303,2469	
58-1-0969	PAD Croobyar Creek CCPHN	AGD	56	266150	6090550	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		99599,99715
	Contact	Recorders						Permits	2303,2469	

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SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
58-1-0958	CS22 - Lake Conjola Entrance Road 2	AGD	56	268142	6094340	Open site	Valid	Modified Tree (Carved or Scarred) : 1		98243,99719,1 00646
	Contact T Russell									
	Recorders Navin Officer Heritage Consultants Pty Ltd							Permits		
58-1-0959	PAD3 (Conjola Sewerage Scheme)	AGD	56	270838	6093773	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		98243,99719,1 00646
	Contact T Russell									
	Recorders Navin Officer Heritage Consultants Pty Ltd							Permits 2283		
58-1-0960	CS26 - Conjola Sewerage 26 and PAD5	AGD	56	269380	6094240	Open site	Valid	Potential Archaeological Deposit (PAD) : 1, Artefact : 1		99330,99719,1 00646
	Contact T Russell									
	Recorders Navin Officer Heritage Consultants Pty Ltd							Permits 2283,2393		
58-1-0961	CS21 - Lake Conjola Entrance Road 1	AGD	56	267507	6094314	Open site	Valid	Modified Tree (Carved or Scarred) : 1		98243,99719,1 00646
	Contact T Russell									
	Recorders Navin Officer Heritage Consultants Pty Ltd							Permits 2292		
58-1-0963	CS23 Lake Conjola Isolated Find 4	AGD	56	270960	6093750	Open site	Valid	Artefact : 1		98243,99719,1 00646
	Contact T Russell									
	Recorders Navin Officer Heritage Consultants Pty Ltd							Permits 2292		
58-1-0964	NW4 (Narrawallee 4)	AGD	56	269498	6089487	Open site	Valid	Artefact : 15		99154
	Contact T Russell									
	Recorders Navin Officer Heritage Consultants Pty Ltd							Permits 2286		
58-1-1019	Springfield 3 (S3)	GDA	56	268870	6086160	Open site	Valid	Artefact : 268		
	Contact									
	Recorders Mr.Peter Kuskie							Permits		
58-1-0284	Burrill lake site 53	AGD	56	267010	6084100	Open site	Valid	Shell : -, Artefact : -	Midden	1378
	Contact									
	Recorders Mr.D White							Permits		
58-1-0290	Burrill lake isolated find K	AGD	56	268250	6083630	Open site	Valid	Artefact : -	Isolated Find	1378
	Contact									
	Recorders Mr.D White							Permits		
58-1-1041	Matron Porter Drive AS1	GDA	56	269402	6088333	Open site	Valid	Artefact : 1		
	Contact									
	Recorders Artefact - Cultural Heritage Management - Pyrmont, Doctor.Samantha Gibbins							Permits		
58-1-1094	Garrad Reserve 1	GDA	56	269417	6090404	Open site	Valid	Shell : -		
	Contact									
	Recorders Biodiversity Conservation Trust of NSW, Mr.Tobi Edmonds							Permits		
58-1-0719	Pattimores 1	AGD	56	271250	6093100	Open site	Valid	Artefact : -	Open Camp Site	
	Contact									
	Recorders Kerry Navin, Mr.Kelvin Officer							Permits		
58-1-0720	MP1	AGD	56	271300	6093250	Open site	Valid	Artefact : -	Open Camp Site	
	Contact									
	Recorders Kerry Navin, Mr.Kelvin Officer							Permits		
58-1-0721	LC IF2	AGD	56	267150	6094080	Open site	Valid	Artefact : -	Isolated Find	

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SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	Contact	Recorders	Kerry Navin,Mr.Kelvin Officer					Permits		
58-1-0722	LC IF1	AGD	56	267850	6094160	Open site	Valid	Artefact : -	Isolated Find	
	Contact	Recorders	Kerry Navin,Mr.Kelvin Officer					Permits		
58-1-0723	Ulladulla STP 1	AGD	56	269230	6083090	Open site	Valid	Modified Tree (Carved or Scarred) :	Scarred Tree	
	Contact	Recorders	Kerry Navin,Mr.Kelvin Officer					Permits		
58-1-0724	Ulladulla STP 2	AGD	56	268350	6082980	Open site	Valid	Shell : -, Artefact : -	Midden,Open Camp Site	97561
	Contact	Recorders	Kerry Navin,Mr.Kelvin Officer					Permits	1574,1601,3424	
58-1-0725	Ulladulla STP 3	AGD	56	268310	6083120	Open site	Valid	Modified Tree (Carved or Scarred) :	Scarred Tree	97561
	Contact	Recorders	Kerry Navin,Mr.Kelvin Officer					Permits		
58-1-0726	Ulladulla STP 4	AGD	56	268350	6082920	Open site	Valid	Artefact : -	Open Camp Site	97561
	Contact	Recorders	Kerry Navin,Mr.Kelvin Officer					Permits	1697,3424	
58-1-0718	Ulladulla Site	AGD	56	270550	6084090	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders	Mr.Carlos Torres					Permits		
58-1-0717	MUB4	AGD	56	265640	6090140	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders	Kerry Navin,Mr.Kelvin Officer					Permits		
58-1-0729	GD1	AGD	56	269560	6087600	Open site	Valid	Modified Tree (Carved or Scarred) :		
	Contact	Recorders	Navin Officer Heritage Consultants Pty Ltd					Permits		
58-1-0730	Conjola Spur 1	AGD	56	267350	6093500	Open site	Valid	Artefact : -		
	Contact	Recorders	Navin Officer Heritage Consultants Pty Ltd					Permits		
58-1-0822	MU1	AGD	56	269900	6089940	Open site	Valid	Artefact : -		
	Contact	Recorders	Navin Officer Heritage Consultants Pty Ltd					Permits		
58-1-0823	BANNISTERS POINT MIDDEN	AGD	56	271240	6088160	Open site	Valid	Artefact : -		
	Contact	Recorders	Navin Officer Heritage Consultants Pty Ltd					Permits		
58-1-0824	MU IF2	AGD	56	269110	6082530	Open site	Valid	Artefact : -		
	Contact	Recorders	Navin Officer Heritage Consultants Pty Ltd					Permits		
58-1-1006	Burril Lake Site 46	AGD	56	266500	6083540	Open site	Valid	Shell : -		1378
	Contact T Russell	Recorders	Mr.D White					Permits		
58-1-1007	Springfield 1 (S1)	AGD	56	268950	6086050	Open site	Valid	Artefact : 1, Shell : 1		100259,10064 4
	Contact	Recorders	Mr.Peter Kuskie,Mr.Peter Kuskie					Permits		

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SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
58-1-1008	Springfield 2 (S2)	AGD	56	268910	6086050	Open site	Valid	Artefact : 1, Shell : 1		100259,10064 4
	Contact									
	Recorders									
	Permits									
58-1-1009	Springfield 3 (S3)	AGD	56	268870	6086160	Open site	Valid	Artefact : 1, Shell : 1		100259,10064 4
	Contact									
	Recorders									
	Permits									
58-1-1010	Springfield 4 (S4)	AGD	56	268940	6086140	Open site	Valid	Artefact : 1, Shell : 1		100259,10064 4
	Contact									
	Recorders									
	Permits									
58-1-1011	Springfield 5 (S5)	AGD	56	268900	6086520	Open site	Valid	Artefact : 1, Shell : 1		100259,10064 4
	Contact									
	Recorders									
	Permits									
58-1-1012	Springfield 6 (S6)	AGD	56	268760	6086530	Open site	Valid	Artefact : 1, Shell : 1		100259,10064 4
	Contact									
	Recorders									
	Permits									
58-1-1025	USP-OS-2 (formerly PAD 1 Ulladulla Sports Park)	GDA	56	269537	6082857	Open site	Partially Destroyed	Potential Archaeological Deposit (PAD) : 1, Artefact : 19		102208,10248 0
	Contact									
	Recorders									
	Permits									
58-1-1026	USP-IF-1	GDA	56	269562	6082845	Open site	Partially Destroyed	Artefact : 1, Potential Archaeological Deposit (PAD) :-		102208,10248 0
	Contact									
	Recorders									
	Permits									
58-1-1027	USP-OS-1	GDA	56	269569	6082882	Open site	Partially Destroyed	Artefact : 2, Potential Archaeological Deposit (PAD) :-		102208,10248 0
	Contact									
	Recorders									
	Permits									
58-1-1055	Narrawallee Creek Inlet	GDA	56	270292	6090200	Open site	Valid	Artefact : -		
	Contact									
	Recorders									
	Permits									
58-1-1056	Narrawallee Southern Reserve	GDA	56	270000	6089355	Open site	Valid	Artefact : -		
	Contact									
	Recorders									
	Permits									
58-1-1057	Narrawallee Southern Reserve 1	GDA	56	270002	6089386	Open site	Valid	Artefact : -		
	Contact									
	Recorders									
	Permits									
58-1-1095	Matron Porter Drive AS	GDA	56	269923	6089251	Open site	Valid	Artefact : -		
	Contact									
	Recorders									
	Permits									

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Appendix 3 – Responses from RAPs



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

6/10/2020

Karia Lea Bond
Badu (Murrin Clan/Peoples)
11 Jeffery Pl
Moruya, NSW 2537

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Karia,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

Tocomwall Pty Ltd have been engaged by School Infrastructure Programs NSW to undertake community consultation in accordance with OEHs *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Tocomwall Pty Ltd is requesting the names and contact details of Aboriginal people or organisations that may hold cultural knowledge relevant to determining the significance of Aboriginal Objects and/or Places within the study area. The purpose of community consultation with Aboriginal people is to assist the proposed applicant in the preparation of an application for an AHIP and to assist the Director General of DECCW in his or her consideration and determination of the application.

In accordance with the consultation requirements, please note that the relevant client contact for this project is:

Michael Stern, Project Officer
School Infrastructure Projects NSW
Tel: 0437 969 922
GPO Box 33
Sydney NSW 2001

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

6/10/2020

Lee Field
Barraby Cultural Services
6 Macgibbon Pde
Old Erowal Bay NSW 2540

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Lee,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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Michael Stern, Project Officer
School Infrastructure Projects NSW
Tel: 0437 969 922
GPO Box 33
Sydney NSW 2001

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



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PO Box 76 Caringbah NSW 1495

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Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

6/10/2020

Batemans Bay Local Aboriginal Land Council
PO Box 542
Batemans Bay NSW 2536

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

To whom it may concern,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Seli Storer
Biamanga
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Seli,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Simalene Carriage
Bilinga
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Simalene,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Noel Butler
nuragunyu@gmail.com

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Noel,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Darryl Caines
11/17-19 Crove Ct
Lake Illawarra 2528

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Darryl,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Gary Caines
28 Gowan Brae Ave
Mt Ousley NSW 2519

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Gary,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Corey Smith
Cullendulla
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Corey,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Anna O'Hara
Darug Land Observations
PO Box 2006
Bendelong NSW 2539

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Anna,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Andrew Bond
Dharug
(Murrin Clan/Peoples)
PO Box 2006

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Andrew,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Joanne Butler
Eora Heritage Group

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Joanne,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Clive Freeman
6 Dhugan Cl
Wreck Bay Aboriginal Community
Jervis Bay 2540

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Clive,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Gordon Campbell
Gadhu Dreaming

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Gordon,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Basil Smith
Goobah Development PTY LTD
66 Grantham Rd
Batehaven NSW 2536

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Basil,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (OEH 2010)* and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Gundungurra Tribal Technical

ATTN: David Bell, Pimmy Johnson Bell, Peter Foster, Teangi Mereki Foster, Larry Hoskins, Christopher Payne, Sam Wickman

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Gundungurra Tribal Technical,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Jodie Edwards & Lisa Bazzano
Gumaraa

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Jodie and Lisa,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Kylie Ann Bell
Gunyuu
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Kylie,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Richard Campbell
Guunamaa Dreamin Sites and Surveying
2 Minda Cres
Oak Flats NSW 2529

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Richard,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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School Infrastructure Projects NSW
Tel: 0437 969 922
GPO Box 33
Sydney NSW 2001

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



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PO Box 76 Caringbah NSW 1495

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ABN: 13 137 694 618

6/10/2020

Jodi Anne Stewart
Jerringong
2/10 Burnett Ave
Gerringong NSW 2534

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Jodi,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Alfred Wellington CEO
Jerrinja Local Aboriginal Land Council
PO Box 167
Culburra Beach NSW 2540

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Alfred,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Aaron Broad
Minnamunnung
1 Waratah Ave
Albion Park Rail NSW 2527

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Aaron,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Kaya Dawn Bell
Munyunga
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Kaya,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Roxanne Smith
Murramarang
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Roxanne,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (OEH 2010)* and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Ryan Johnson and Darleen Johnson
Murra Bidgee Mullangari Aboriginal Corporation

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Ryan and Darleen,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Mark Henry
Murrumbul
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Mark,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Nowra Local Aboriginal Land Council
PO Box 528
Nowra NSW 2541

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

To whom it may concern,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Newton Carriage
Nundagurri
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Newton,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Pemulwuy Johnson
Pemulwuy
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Pemulwuy,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Owen Carriage
South Coast NSW Aboriginal Elders

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Owen,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

John Carriage
Thoorga Nura
50B Hilltop Cres
Surf Beach NSW 2536

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear John,

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6/10/2020

Leonard Wright
Three Ducks Dreaming Surveying and Consulting
40 Tuggerah Ct
Flinders NSW 2529

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Leonard,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Troy Tungai
Tungai Tonghi
10 Paterson Pl
Barrack Heights 2528

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Troy,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Leanne Tungai

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Leanne,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Ulladulla Local Aboriginal Land Council
PO Box 520
Ulladulla NSW 2539

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

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6/10/2020

Hika Te Kowhai
Walbunja
15 Renee Cres
Moruya Heads NSW 2537

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Hika,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Ronald Stewart
Walgalu
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Ronald,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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In accordance with the consultation requirements, please note that the relevant client contact for this project is:

Michael Stern, Project Officer
School Infrastructure Projects NSW
Tel: 0437 969 922
GPO Box 33
Sydney NSW 2001

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

6/10/2020

Nathanial Kennedy
Warra Bingi Nunda Gurri

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Nathanial,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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6/10/2020

Gayle Watts

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Gayle,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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ABN: 13 137 694 618

6/10/2020

Noel Webster
20 Peacehaven Way
Sussex Inlet NSW 2540

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Noel,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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ABN: 13 137 694 618

6/10/2020

Hayley Bell
Wingikara
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Hayley,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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ABN: 13 137 694 618

6/10/2020

Lee-Roy James Boota
Wullung
54 Blackwood St
Gerringong NSW 2534

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Lee-Roy,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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ABN: 13 137 694 618

6/10/2020

Blaan Davies
Yerramurra and Taste of Tradition Native Aboriginal Corporation

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Blaan,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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ABN: 13 137 694 618

6/10/2020

Bo Field
Yurrandaali Cultural Services
3 Sheeran St
Old Erawal Bay NSW 2540

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Bo,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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ABN: 13 137 694 618

6/10/2020

Paul McLeod
South Coast People

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Paul,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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ABN: 13 137 694 618

7/10/2020

Karrial Johnson
Karrial
(Murrin Clan/Peoples)

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Karrial,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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ABN: 13 137 694 618

7/10/2020

Edward Moran, Director
South West Rocks Corporation
4 Crystal Pl
South West Rocks NSW 2431

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Edward,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (OEH 2010)* and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

Interested Aboriginal organisations or people having cultural knowledge relating to this area are invited to register their interest in writing to:

Dani Mitchell
Tocomwall Pty Ltd
PO Box 76
Caringbah NSW 1495
danielle.mitchell@puliypang.com.au

Please note under the consultation requirements your details will be forwarded to the OEH and Ulladulla Local Aboriginal Land Council (LALC) upon receipt of your registration of interest. If you do not wish to have your details forwarded on, please notify Tocomwall when registering your interest in the proposed project. Note that under OEH guidelines, registration for consultation does not include employment in field activities or site monitoring.

Please forward your response by **4pm 20th of October 2020**.

Yours Sincerely,

D. Mitchell

Dani Mitchell
Archaeologist
0466 676 510

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



ATTN: Gordon Wellington
Shoalhaven Elders & Friends Organisation
1 Roma Ct
Bomaderry NSW

2 5 4 1



Ronald Carberry
13 Roseby Park
Orient Point NSW

2 5 4 0



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Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

7/10/2020

Ronald Carberry
13 Roseby Park
Orient Point NSW 2540

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Ronald,

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ABN: 13 137 694 618

7/10/2020

Gordon Wellington, Chairperson
Shoalhaven Elders and Friends Organisation
1 Roma Cl
Bomaderry NSW 2541

RE: Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – identification of interested Aboriginal parties

Dear Gordon,

The proponent, School Infrastructure Projects NSW, is preparing a Development Application (DA) for a proposed school upgrade and potential future expansion at the former Shoalhaven Anglican school, Lot 200 DP 1192140, Croobyar Rd, Milton, within the Shoalhaven Local Government Area (LGA). As part of the development application process the proponent is required to complete an Aboriginal Cultural Heritage Investigation in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (OEH 2010) and part 8A of the *National Parks and Wildlife Regulation 2009* in preparation for the application of an AHIP.

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Please forward your response by **4pm 21st of October 2020**.

Yours Sincerely,

D. Mitchell

Dani Mitchell
Archaeologist
0466 676 510

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Blaen Davies <blaen.davies@my.jcu.edu.au>
To: Danielle Mitchell

Reply Reply All Forward ...

Tue 6/10/2020 5:28 PM

registered interest

If there are problems with how this message is displayed, click here to view it in a web browser.

Hi Danielle,

Thank you for your correspondence.

I would like to engage interest with Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment School Infrastructure Projects NSW in assisting and determining Aboriginal heritage.

if you require further information and or require feild officers to assist with this application please do not hesitate to maintain contact with me.

regards,

Blaen Davies

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Leanne Tungai <leannecaroltungai@gmail.com>
To: Danielle Mitchell

Reply Reply All Forward ...

Tue 6/10/2020 5:54 PM

registered interest

If there are problems with how this message is displayed, click here to view it in a web browser.

Received, thank you.

Please register my Group Leanne Tungai

Phone number 0478157604

Thank you

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Clive Freeman <clive.freeman@y7mail.com>
To: Danielle Mitchell

Reply Reply All Forward ...

Tue 6/10/2020 9:26 PM

registered interest

Hi team,

We at Freeman&marx Pty Ltd would like to register an interest we have 3 male and 3 female officers.

Please forward all relevant material to us and we will look over them and provide relevant feedback as required.

We look forward to working with you and the team on this project.

If you would like a copy of our certificate of currency please let me know.

Kind regards,

Clive

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Ulladulla Local Aboriginal Land Council <admin@ulladullalalc.com.au>
To: Danielle Mitchell

Reply Reply All Forward ...

Wed 7/10/2020 6:41 AM

registered interest

We could not verify the identity of the sender. Click here to learn more.

Hi Danielle,

The Ulladulla LALC holds an interest in this investigation and will require to have a representative on site during any works or surveys.

Shane Carriage

CEO

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Aaron Broad <djirrawidch@gmail.com>
To: Danielle Mitchell

Reply Reply All Forward ...

Wed 7/10/2020 3:56 AM

registered interest

If there are problems with how this message is displayed, click here to view it in a web browser.

Attention Danielle Mitchel

Regarding - I would like to register my expression of interest for the Milton public school project yours kindly

Aaron Broad

Address - 1 Waratah ave Albion Park Rail 2527 N.S.W

contact -

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Paul James Mcleod <poppymac58@gmail.com>
To: Danielle Mitchell

Reply Reply All Forward ...

Wed 7/10/2020 10:47 AM

registered interest

If there are problems with how this message is displayed, click here to view it in a web browser.

Received, thank you. I would like to be considered for site as I'm a n elder and have worked on site work on the south coast Sydney to Victoria boarder for passed 40yrs and more. Also an Applicant for the Native Title unit her on the South Coast there 12 Representatives . Ok that's and let me know

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Bo Field <yurraandaali_cs@outlook.com>
To: Danielle Mitchell

Reply Reply All Forward ...

Wed 7/10/2020 12:42 PM

registered interest

If there are problems with how this message is displayed, click here to view it in a web browser.

Dear Danielle

Yurraandaali Pty Ltd would like to register and be consulted on this project.

Many Thanks,
Bo Field

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Lee Field <barrabyculturalservices@gmail.com>
To: Danielle Mitchell

Reply Reply All Forward ...

Wed 7/10/2020 12:44 PM

registered interest

Dear Danielle

Barraby would like to register and be consulted on the future updates for this project.

Many thanks
Lee Field

Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



Troy Tungai <Troytungai72@outlook.com>
To: Danielle Mitchell

Reply Reply All Forward ...

Wed 7/10/2020 10:55 PM

If there are problems with how this message is displayed, click here to view it in a web browser.

Hi danielle

Thanks for your email yes i troytungai would like to put my exsspression of interest in for this upcoming project thanks troy



Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects



richardcampbell123@outlook.com

To Danielle Mitchell

Reply

Reply All

Forward



Fri 9/10/2020 8:32 AM

registered interest

[If there are problems with how this message is displayed, click here to view it in a web browser.](#)

Hi I would like to be involved with the fieldwork for this project.

Kindest regards

Richard





Appendix 4 – Project information pack and methodology pack



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

20/10/2020

Lee Field
Barraby Cultural Services
6 Macgibbon Pde
Old Erowal Bay NSW 2540

Dear Lee,

RE: Budawang SSP, Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – Project Information

Thank you for your registering your interest in this project. In this letter, you will be presented with the project information for the proposed development at Lot 200 DP 1192140, Croobyar Rd, Milton. This information has been provided in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010).

If you have any queries regarding the project or the information in this letter, please don't hesitate to contact us.

Yours sincerely,

D. Mitchell

Dani Mitchell

Archaeologist
0466 676 510

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



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ABN: 13 137 694 618

20/10/2020

Clive Freeman
6 Dhugan Cl
Wreck Bay Aboriginal Community
Jervis Bay 2540

Dear Clive,

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PO Box 520
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Blaan Davies
Yerramurra and Taste of Tradition Native Aboriginal Corporation

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Bo Field
Yurrandaali Cultural Services
3 Sheeran St
Old Erowal Bay NSW 2520

Dear Bo,

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Project information

The following information has been provided in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. The aim of this document is to provide registered Aboriginal parties with information about the proposed project and the scope of the Aboriginal archaeology and cultural heritage investigations and assessment.

The existing Budawang School for Special Purposes is currently located on Camden Street in Ulladulla within buildings it has occupied since the 1980s. The entry criteria for students to Budawang SSP is an assessment of moderate to severe intellectual disability. Typically, this is coupled with other disabilities, conditions or requirements, such as a sensory condition, autism, behavioural and/or emotional disorders, and/or severe physical disabilities.

Due to the rise in enrolments, the core facilities are no longer adequate for the current size of the school and there is insufficient outdoor space for learning and play. The existing buildings, particularly the core facilities, are in poor condition and have been assessed as being not fit for purpose. As the site is leased and is now too small to offer the required provision, relocation of Budawang SSP is necessary.

In 2018, the NSW Department of Education purchased the former Shoalhaven Anglican School, which is located on Croobyar Road in Milton, near the junction with the Princes Highway. The 7.6-hectare site contains numerous educational buildings dating from around the 1980s to the early 2000s, many of which are in good, well maintained condition. The relocation will see the development of new buildings and facilities in the north west section of the property, and potential future use of the existing buildings on the site.

Tocomwall Pty Ltd have been engaged by School Infrastructure Projects NSW to undertake an Aboriginal Cultural Heritage Assessment in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010*. Consultation with the Aboriginal community will follow the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. The purpose of the consultation will be to provide enough information for the assessment of Aboriginal cultural heritage values to complete the Aboriginal Cultural Heritage Assessment (ACHA). This will assist in the event an application for an AHIP is required, and will assist the Department of Planning, Industry and Environment (DPIE) in consideration and determination of the application.

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**Figure 1: Former Anglican School, Lot 200 in D.P. 1192140, Croobyar Rd Milton.
Image source Nearmap (15/9/20)**

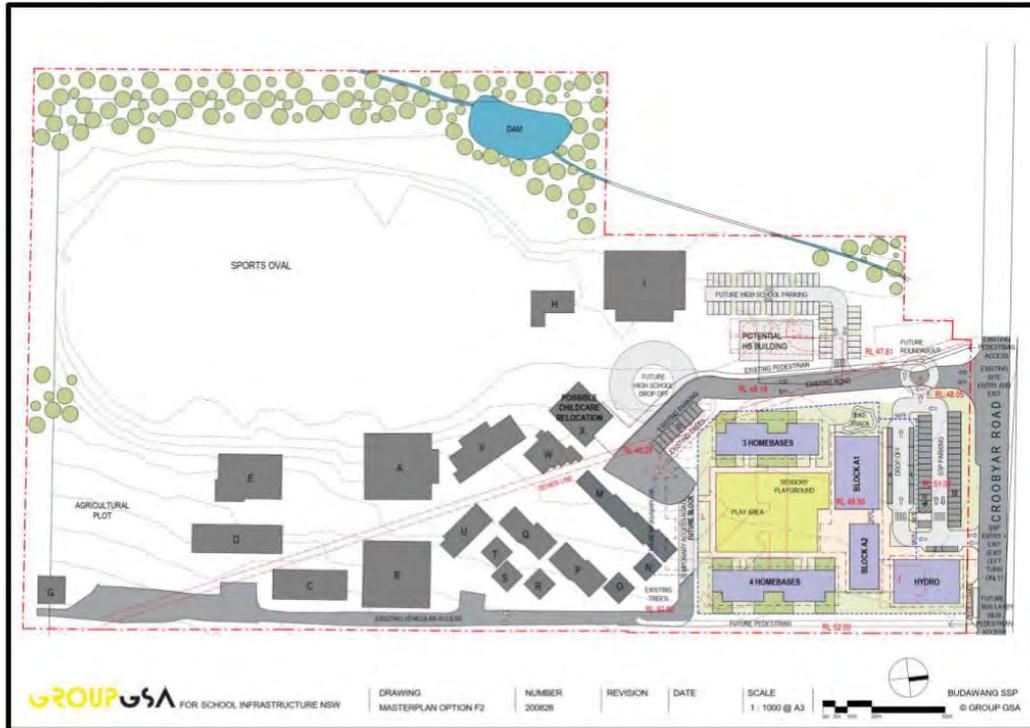


Figure 2: Proposed masterplan for Budawang SSP located at Lot 200 in D.P. 1192140, Croobyar Rd Milton (source: Group GSA).



Objectives of the Aboriginal Heritage Assessment

The objectives of the Aboriginal Heritage assessment are to:

- Implement the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* with the objective of identifying and engaging Aboriginal knowledge holders for the study area.
- Review previous archaeological studies undertaken in the vicinity.
- Conduct an AHIMS search, large enough to allow adequate landscape interpretation and adequate understanding of the distribution of the sites within the landscape (Fig 3).
- Review the landscape context to help inform the predictive model.
- Summarise and discuss the local and regional character of Aboriginal land use and its material traces.
- Predict the nature and extent of archaeological evidence at the site.
- Undertake an archaeological survey and record the presence and extent of Aboriginal objects that are present in the study area.
- Involve the Aboriginal knowledge holders in the cultural heritage assessment process, including consultation to determine their opinions with respect to the project and its potential 'harm' to their cultural heritage and measures to protect their cultural heritage.
- Determine if there is a need to extend the investigation to undertake test excavations.
- Determine the nature and extent of the impacts of the proposed development upon the Aboriginal cultural heritage of the study area.
- Make recommendations for the protection of Aboriginal cultural heritage at the study area.

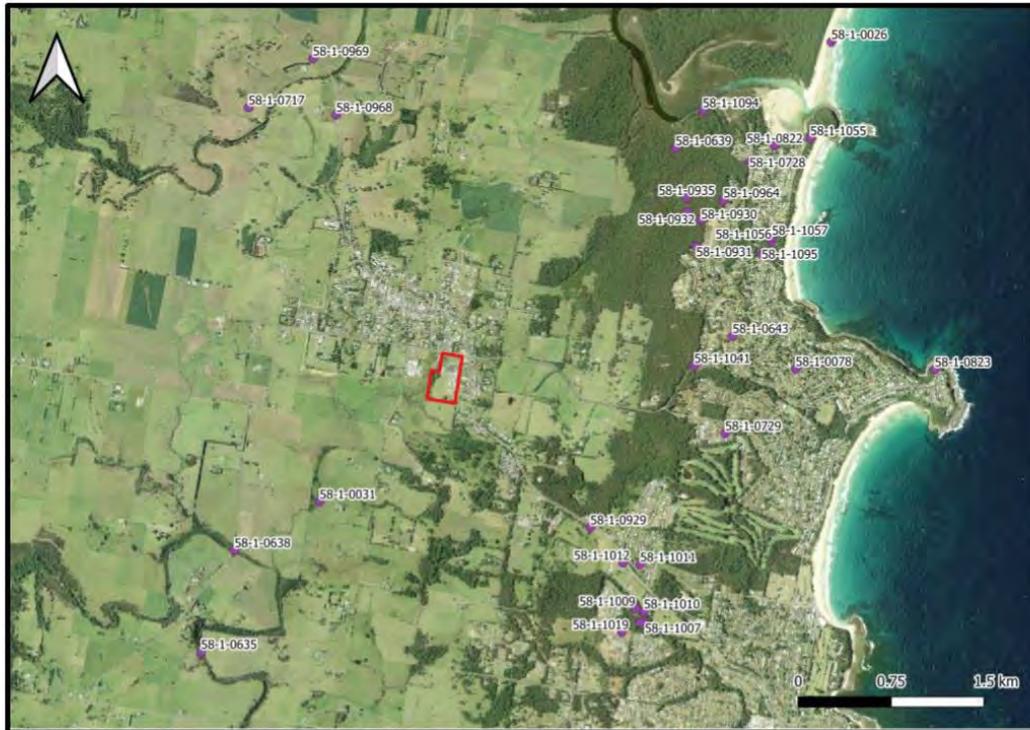


Figure 3: AHIMS search results

Consultation with the Aboriginal community

Consultation allows the opportunity for the Aboriginal community to participate in the management of their cultural heritage by providing valuable information regarding cultural significance at or near to the project location.

The process also allows the opportunity for the Aboriginal community to express ideas and/or concerns regarding the projects impact on cultural heritage and future management of Aboriginal objects if needed.

Aboriginal community consultation will be undertaken in accordance with the consultation requirements (DECCW 2010) which includes:

4.1.2. Requesting the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places within the proposed study area. A letter was sent to the following:

- Heritage NSW
- Ulladulla Local Aboriginal Land Council (LALC)
- Office of the Registrar, Aboriginal Land Rights Act 1983
- National Native Title Tribunal (NNTT)

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- *Native Title Services Corporation Limited (NTSCORP Limited)*
- *Relevant Local Council(s)*
- *Relevant Catchment Management Authorities*

4.1.3. Write to the people whose names were obtained in step 4.1.2, requesting a registration of interest to those who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project. Include an overview of the project, the name and contact details of the proponent and a statement of the purpose of community consultation.

Registrations of interest will close on October 21st, 2020. A list of Aboriginal people or groups who registered an interest in the project has been compiled and this will be forwarded to the Department of Planning, Industry and Environment and the Local Aboriginal Land Council by Tocomwall within 28 days of the close of registrations.

Roles and responsibilities

Tocomwall Pty Ltd will manage the Aboriginal Cultural Heritage Assessment. The assessment will be undertaken and managed by Senior Archaeologists, William Moon 0419 399 230, and Danielle Mitchell 0466 676 510. Any enquires regarding the project should be directed to either William or Danielle.

The roles and responsibilities outline below, are in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010):

Registered Aboriginal parties

The interests and obligations of Aboriginal people relate to the protection of Aboriginal cultural heritage.

- Display a meaningful appreciation, understanding and respect for the belief system, spiritual connection and sense of belonging that Aboriginal people have to their land, people and environment, which includes plants, animals, waterways, sacred sites and other places of cultural significance and importance.
- Uphold and respect the traditional rights, obligations and responsibilities of Aboriginal people who hold cultural knowledge in accordance with traditional lore and custom, particularly as these relate to the cultural business of men and women .
- Encourage active participation of culturally experienced and appropriate Aboriginal people who hold cultural knowledge in the consultation process.
- Encourage opportunities for the effective transfer of cultural knowledge from older to younger generations in accordance with traditional lore and custom through the consultation process
- Have an awareness and understanding of how colonisation has impacted the Aboriginal people of Australia.
- Have an understanding and respect for the lore and customs, cultural practices, responsibilities and obligations that Aboriginal people have toward the continued care and conservation of Aboriginal objects and places.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report, unless otherwise requested due to sensitivity.

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Proponents

- Bring the registered Aboriginal parties or their nominated representatives together and be responsible for ensuring appropriate administration and management of the consultation process.
- Consider the cultural perspectives, views, knowledge and advice of the registered Aboriginal parties involved in the consultation process in assessing cultural significance and developing any heritage management outcomes for Aboriginal object(s) and/or place(s).
- Provide evidence to DECCW of consultation by including information relevant to the cultural perspectives, views, knowledge and advice provided by the registered Aboriginal parties
- Accurately record and clearly articulate all consultation findings in the final cultural heritage assessment report.
- Provide copies of their cultural heritage assessment report to the registered Aboriginal parties who have been consulted.
- Submit an application to DECCW for an AHIP in a timely manner and with all required information.

Field survey

An Aboriginal field survey of the project area will be conducted in accordance with requirement 5 in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010*. The purpose of the survey is to record any material traces and evidence that are visible on the ground surface, exposed in sections or visible as features. The survey also helps to identify the level of disturbance to the area which will help determine the likelihood of material traces or evidence of Aboriginal land use being present below the ground surface.

Registered sites identified by an AHIMS search that are within or near the project area will be inspected to determine their current condition and the likeliness of the site being impacted by the proposed works. Any Aboriginal objects, including those previously registered on AHIMS are to be recorded. New sites are to be recorded using the appropriate AHIMS Feature Recording Form.

Reporting

A draft report will be prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010* and will include:

- A description of the development proposal, outlining activities that have the potential to harm Aboriginal objects.
- A summary of previous archaeological work to provide a context and baseline for known Aboriginal cultural heritage in the project area.
- A review of the landscape context to predict the ways in which the land may have been used by Aboriginal people in the past and the likeliness of material traces.
- A summary discussing the local and regional character of Aboriginal land use and material traces, based on information provided above.
- A predictive model of archaeological potential in the project area.
- A description on how the archaeological survey and test excavation (if relevant) was conducted and recorded.

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- The results of the field survey and/or test excavation.
- Analysis and discussion of the results.
- The identification of archaeological values and significance reflecting best practice assessment processes as outlined in the Burra Charter.
- An impact assessment to evaluate the potential archaeological impacts of the project.
- Management and mitigation measures to look at options at managing the impacts.
- Recommendations for the conservation of archaeological values.

Registered Aboriginal parties will be provided with the draft report for comment and allowed 28 days for review.

Project schedule

Action	Date	Status	Notes
Commencement of Aboriginal Consultation	Complete	Complete	Request for names of Aboriginal people or groups who may hold cultural knowledge sent 24 September 2020.
Expressions of interest and newspaper advertisement	Complete	Complete	Expression of interest sent to identified Aboriginal parties by email 6 October 2020; post 7 October 2020. Advertised in the Milton Ulladulla Times 30 September 2020.
Aboriginal Stakeholder Registration period	Complete	Complete	Registration period ended 21 October 2020.
Send Project Package	Complete	Complete	
Opportunity for RAP to visit site	28/10/20	Pending	An email invitation will be sent to the registered Aboriginal parties (RAPs) to provide an opportunity for a visit to site. <i>Note: This site visit does not include paid field work.</i>
Send Proposed Methodology for the Aboriginal Cultural Heritage Assessment	During Week Ending 6/11/20 at latest	Pending	
Review of draft report	TBC	Pending	
Final report	TBC	Pending	



References

Department of Environment, Climate Change and Water. 2010a. *Code of practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010*. NSW Department of Environment, Climate Change and Water, Sydney NSW.

Department of Environment, Climate Change and Water. 2010b. *Aboriginal cultural heritage consultation requirements for proponents 2010*. NSW Department of Environment, Climate Change and Water, Sydney NSW.



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3 November 2020

Lee Field
Barraby Cultural Services
6 Macgibbon Pde
Old Erowal Bay NSW 2540

Dear Lee ,

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Dear Shane,

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In this letter, you will be presented with the project methodology and archaeological assessment for the proposed development at Lot 200 DP 1192140, Croobyar Rd, Milton. This information has been provided in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010).

In accordance with the consultation requirements (2010), you have the opportunity to review and provide feedback on culturally appropriate information to the research methodology, relating to places of social, spiritual and cultural value, and potential places/areas of historic, social, spiritual and/or cultural significance.

The review should identify any protocols that you wish to be adopted into the information gathering process and assessment methodology and any matters such as issues/areas of cultural significance that might affect, inform or refine the assessment methodology.

Please provide your feedback in writing no later than **December 1st 2020**.

Yours sincerely,

D. Mitchell

Dani Mitchell
Archaeologist
0466 676 510

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



Tocomwall Pty Ltd

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ABN: 13 137 694 618

3 November 2020

Blaan Davies
Yerramurra and Taste of Tradition Native Aboriginal Corporation

Dear Blaan,

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3 November 2020

Bo Field
Yurrandaali Cultural Services
3 Sheeran St
Old Erowal Bay NSW 2520

Dear Bo,

RE: Budawang SSP, Lot 200 DP 1192140, Croobyar Rd, Milton Aboriginal Cultural Heritage Assessment – Project Methodology and Archaeological Assessment

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ABORIGINAL CULTURAL HERITAGE ASSESSMENT METHODOLOGY

Budawang SSP, Milton, NSW

Company	Schools Infrastructure NSW
Contact	Michael Stern
Date	November 2020

Integrating Landscape Science & Aboriginal Cultural Knowledge for Our Sustainable Future



Project Name	Aboriginal Cultural Heritage Assessment for Budawang SSP
Client Name	SINSW
Recipient	Registered Aboriginal Parties
Status	Version 1.0
Issue Date	3 November 2020
Prepared by	Will Moon
Approved by	Scott Franks

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Executive Summary

The proponent, Schools Infrastructure NSW is preparing a development application for the development of new premises for the relocation of the Budawang school from Ulladulla to Milton. The new school will be located on the site of the former Anglican School at Croobyar Road in Milton, NSW. The proposed development is considered state significant development and the application under the Planning Secretaries Environmental Requirements is SD-8845345. The environmental assessment requirements include the completion of an Aboriginal Cultural Heritage Assessment Report (ACHAR). This document describes the proposed methodology for the completion of the ACHAR.

1 Introduction

1.1 Background

Tocomwall Pty Ltd have been engaged by Schools Infrastructure NSW (SINSW) to undertake an Aboriginal Cultural Heritage Assessment in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010*. This methodology has been prepared in accordance with the requirements of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, 2010*.

1.1.1 Statutory Heritage Contexts and Controls

Two primary pieces of legislation provide automatic statutory protection for Aboriginal heritage and the requirements for its management in New South Wales.

These are:

- The *National Parks and Wildlife Act 1974* (NPW Act); and
- The *Environmental Planning and Assessment Act 1979*.

1.1.1.1 National Parks and Wildlife Act 1974

The primary legislation for the protection of Aboriginal culture and heritage in NSW is the *NPW Act*. One of the key objectives stated in the *NPW Act* is:

'..... the conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including but not limited to: (i) places, objects and features of significance to Aboriginal people.... [s.2A (1) (6)].'

The *NPW Act* defines Aboriginal Heritage as comprising 'Aboriginal objects' and 'Aboriginal Places'. Aboriginal heritage is defined as:

- An object under the NPW Act is defined as ‘any deposit, or object or material evidence relating to the Aboriginal habitation of the area’ (Section 5 of the NPW Act); and
- An Aboriginal Place is defined as ‘a place that is or was of special significance with respect to Aboriginal culture’ (Section 84 of the NPW Act).

Part 6 of the NPW Act provides specific protection for Aboriginal objects and declared Aboriginal Places by establishing offences of harm. Harm is defined as ‘..destroying, defacing or damaging an Aboriginal object or place, or moving an object from the land.’ There are fines associated with causing harm to an Aboriginal object. However, there are exemptions for causing harm, for example the preparation of an Aboriginal Heritage Impact Permit (AHIP).

The Department of Planning, Industry and Environment (DPIE) is the current government agency with responsibility for the protection and management of Aboriginal archaeological sites and cultural heritage values and the statutory administration of the NPW Act.

1.1.1.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EPA Act) establishes the statutory planning framework for environmental and land use planning in NSW through *State Environmental Planning Policies* (SEPPs), *Regional Environmental Plans* (REPs) and *Local Environmental Plans* (LEPs).

The EPA Act also establishes the framework for Aboriginal heritage values to be formally assessed in land use planning and development consent processes. The requirements for the project are defined in the Planning Secretary’s Environmental Assessment requirements for application number SSD-10445.

1.1.1.3 Native Title Act 1993

The Native Title Act 1993 provides the legal framework to recognition and protection of native title. It includes the recognition of the traditional rights and interests to land and waters of Aboriginal and Torres Strait Islander people. Under the Native Title Act, native title claimants can make an application to the Federal Court to have their native title recognised by Australian law.

As part of the consultation process for the project it was confirmed that there are no registered native title claimants for the study area.

1.1.1.4 Reporting Standards and Guidelines

This report has been prepared in accordance with the following heritage recording, assessment and reporting guidelines and standards that are endorsed by the OEH:

- Australia ICOMOS. 2013. The Burra Charter. The Australia ICOMOS Charter for Places of Cultural Significance. Australia ICOMOS Inc.¹

¹ The Burra Charter establishes nationally accepted principles for the conservation of places of cultural significance.



- NSW Department of Environment, Climate Change & Water. (DECCW) 2010a. Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. DECCW. Sydney.
- NSW Department of Environment, Climate Change & Water. (DECCW) 2010b (September). Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales. DECCW. Sydney.

1.2 Objectives of the Aboriginal Heritage Assessment

The objectives of the Aboriginal Heritage assessment are to:

- Implement the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 with the objective of identifying and engaging Aboriginal knowledge holders for the study area.
- Review previous archaeological studies undertaken in the vicinity.
- Review the landscape context to help inform the predictive model.
- Summarise and discuss the local and regional character of Aboriginal land use and its material traces.
- Predict the nature and extent of archaeological evidence at the site.
- Undertake an archaeological survey and record the presence and extent of Aboriginal objects that are present in the study area.
- Involve the Aboriginal knowledge holders in the cultural heritage assessment process, including consultation to determine their opinions with respect to the project and its potential 'harm' to their cultural heritage and measures to protect their cultural heritage.
- Determine if there is a need to extend the investigation to undertake test excavations.
- Determine the nature and extent of the impacts of the proposed development upon the Aboriginal cultural heritage of the study area.
- Make recommendations for the protection of Aboriginal cultural heritage at the study area.

2 Description of the Study Area

2.1 Location and Proposed Development

The proposed development of the Budawang SSP is located at Lot 200 in D.P. 1192140. It is the site of the former Anglican school at Croobyar Road in Milton, NSW, close to the intersection of Croobyar Road with the Princes Highway. The site has been used for educational purposes since at least the early 1990s when the Croobyar Christian School opened. After closure of the Croobyar School the site was acquired by

the Shoalhaven Anglican School, who further expanded the facilities, with the most recent buildings on site being constructed as recently as 2015 (Group GSA 2020). Figure 1 to Figure 4 show the layout of the existing buildings within the study area, buildable areas within the site, and the location and proposed arrangement for the Budawang SSP.



Figure 1: Layout of existing buildings within the study area (Group GSA 2020).



Figure 2: Locations considered as buildable areas within the study area (Group GSA 2020).



Figure 3: Budawang SSP site location (Group GSA 2020).

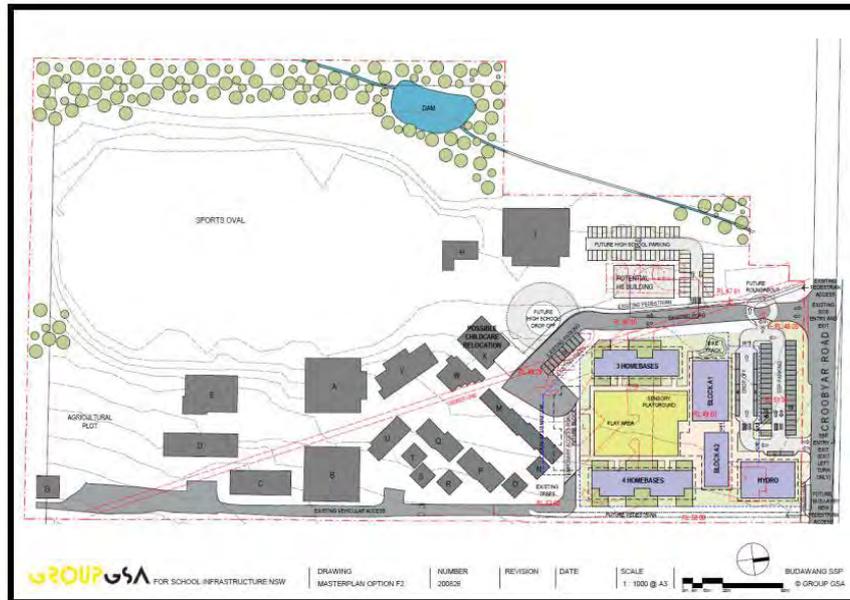


Figure 4: Masterplan option showing the locations of new buildings (Group GSA 2020).

3 Methodology

The following defines the proposed methodology for the Aboriginal Cultural Heritage Assessment (ACHA) as a requirement of the Planning Secretary’s Environmental Assessment Requirements for the Budawang SSP development. The ACHA will be carried out in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010, Aboriginal cultural heritage consultation requirements for proponents 2010, the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011 and Applying for an Aboriginal Heritage Impact Permit: Guide for applicants 2011. The methodology is depicted in Figure 5: ACHA Methodology. The Steps are described in more detail in Table 1.

Step	Method
1: Initiate Consultation Process	The consultation process is initiated in accordance with Aboriginal cultural heritage consultation requirements for proponents 2010.
2: Review previous archaeological work	Review previous archaeological work in accordance with the requirements of Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010. The review of previous archaeological work is defined in 3.3.1 Previous Archaeological assessments.

3: Review the landscape context	The review of the landscape context is defined in sections 3.1 The Environmental Context and 3.2 Site Description and is completed in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
4: Discuss the local and regional character of Aboriginal land use and its material traces	The local and regional character of Aboriginal land use and its material traces is described in section 3.3 The Archaeological Context and in Attachment 1 , the Archaeological Report which has been prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
5: Predict the nature and distribution of evidence	A predictive model is described in 3.5 Predictive Model and has been prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
6: Undertake an archaeological survey	An archaeological survey of the study area was undertaken on Friday the 24 th of July in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010. The results of the survey are described in the archaeological report (Attachment A).
7: Decide if additional archaeological investigation is required?	Refer to the archaeological report (Attachment A). The archaeological assessment and results described in attachment A determined that it is appropriate to undertake further archaeological investigation at the study area. A test excavation program is proposed for the study area.
8: Document findings and interpretation of results in an Archaeological Report	Refer to the archaeological report (Attachment A). Report prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010. This report will be expanded upon following the outcomes of the test excavation program for the study area.
9: Seek cultural information from Registered Aboriginal Parties	Information on the cultural information for the study area is sought during the methodology review and as per requirement 3 of the Aboriginal cultural heritage consultation requirements for proponents 2010. Information gathered includes places of social, spiritual and cultural value, historic places with cultural significance, and potential places/areas of historic, social, spiritual and/or cultural significance. Information gathered will be used to further inform how the landscape was used, the social, cultural, aesthetic, historic and scientific values to enable an overall assessment of the significance of the study area and the associated values. Assessing values and significance will be undertaken as per section 2.4.2 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011.



10: Determine if there will be harm to cultural heritage	Harm, or potential harm will be assessed as per section 2.5 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011. Assessing measures to avoid harm will be considered in accordance with sections 2.6 and 2.7 from the same guide. Registered Aboriginal knowledge holders will be consulted during this process as per the Aboriginal cultural heritage consultation requirements for proponents 2010 to help determine management options and mitigation measures.
11: Complete ACHAR	An Aboriginal Cultural Heritage Assessment Report will be prepared in accordance with section 3 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011.
12: Complete and Submit AHIP if required	If there is a requirement to request an Aboriginal Heritage Impact Permit, this will be done in accordance with Applying for an Aboriginal Heritage Impact Permit: Guide for applicants 2011.

Table 1: ACHA Methodology

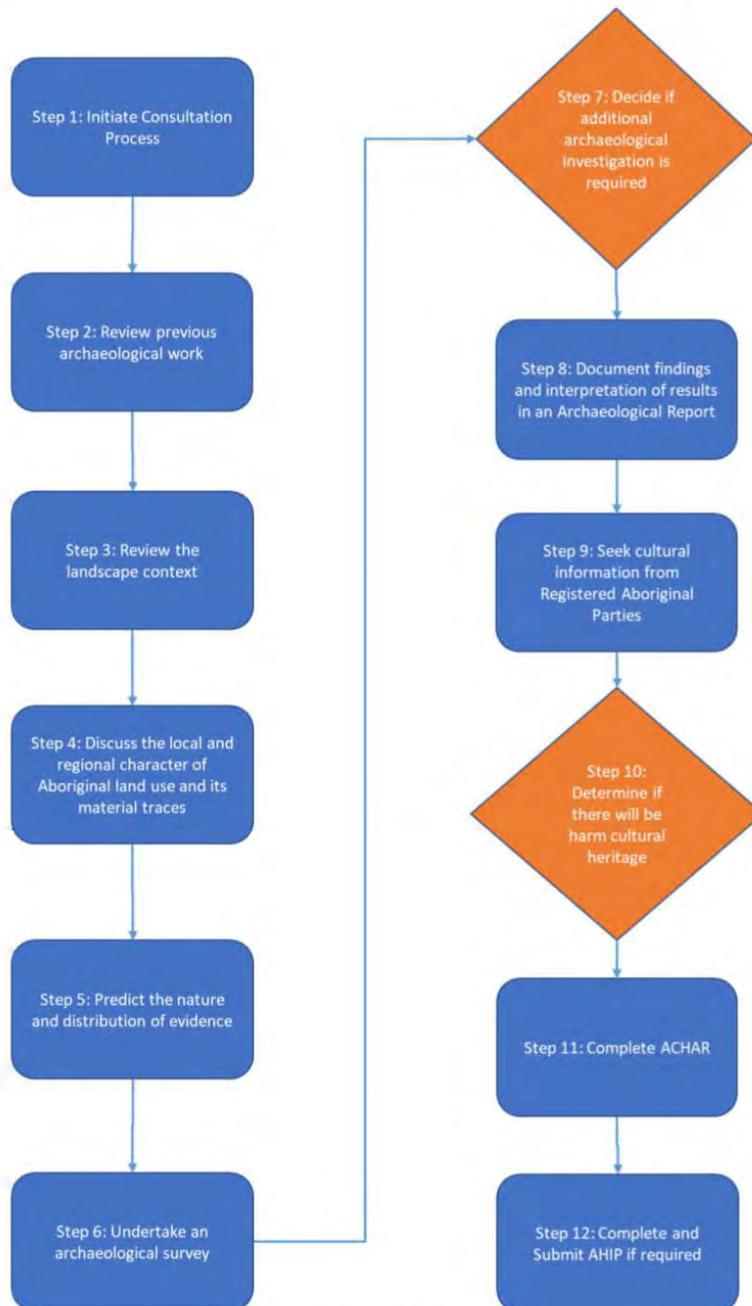


Figure 5: ACHA Methodology

3.1 The Environmental Context

The study area is located within the lowland areas of the South Coast of New South Wales. The landscape of the local and surrounding area can be characterised undulating topography, with landform elements including flats, very gentle to steep slopes, low rises and ridgelines, and crests. The surface geology is part of the Milton Monzonite an igneous intrusion from the Mesozoic (NSW Department of Mines 1966).



Figure 6: Geological map showing the study area over the Milton Monzonite (Mmm).
Source Geological map overlay © New South Wales Government, Australia.

The terrain and soils of the study area are described in the Digital Atlas of Australian Soils as Me1: Hilly with some steep slopes and small graded valleys: moderately steep rounded hills of brown and red friable earths (*Gn3.21 and Gn3.22 and Gn3.11 and Gn3.12*) in association with less rounded hill slopes of hard acidic yellow mottled soils (*Dy3.41*), hard acidic red soils (*Dr2.21*), and yellow leached earths (*Gn3.54*), and also other hill slopes of loamy soils having an A2 horizon (*Um4.2*) with yellow-brown earths (*Gn2.44*) (Northcote *et al.* 1960-68).

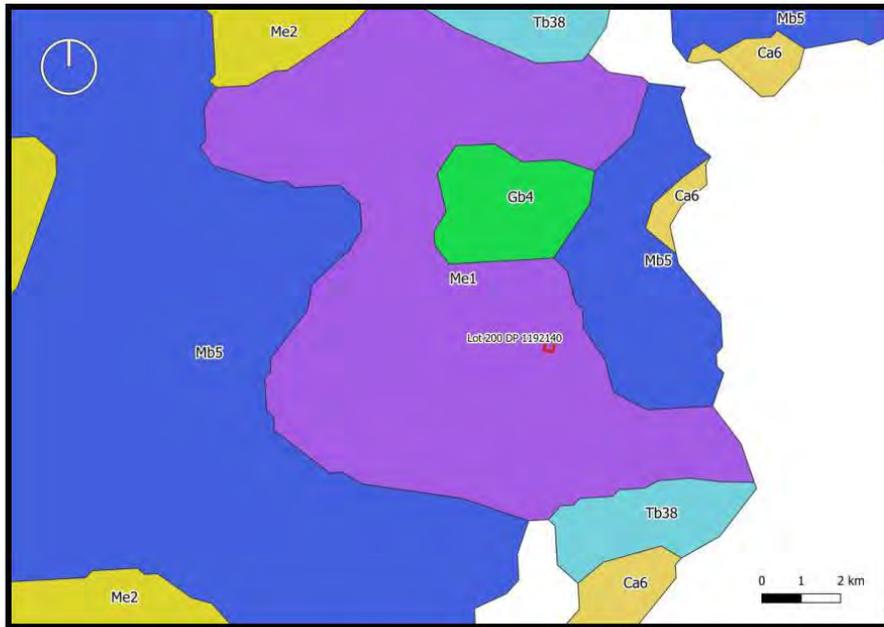


Figure 7: Map of the soil category of the study area. Budawang SSP is located within the purple area representing the Me1 soils (Source Australian Soil Resource Information System).

The vegetation of the study area has been significantly modified by historic European land management practices. Figure 8 shows an aerial image of the study area taken in 1959. All vegetation had been removed from the study area by this time. The study area is most likely to have been originally covered with the critically endangered Milton Ulladulla Subtropical Rainforest. This rainforest community occurs on the soils derived from the Milton Monzonite, and soils derived from the Conjola formation that have been enriched by the basaltic Monzonite soils. Table 2 shows a list of species of plants and trees that are characteristic of the rainforest however the overall number of species is much greater than listed in this table. This is the southern limit for a number of the rainforest species that occur and that are rare on the South Coast (NSW Department of Planning, Industry and Environment 2019).

<i>Acmena smithii</i>	<i>Gymnostachys anceps</i>
<i>Adiantum flabellifolium</i>	<i>Legnephora moorei</i>
<i>Alectryon subcinereus</i>	<i>Malaisia scandens</i>
<i>Aphanopetalum resinosum</i>	<i>Marsdenia rostrata</i>
<i>Arthropteris tenella</i>	<i>Notelaea venosa</i>
<i>Baloghia inophylla</i>	<i>Oplismenus imbecillus</i>

<i>Breynia oblongifolia</i>	<i>Pandorea pandorana</i>
<i>Cissus antarctica</i>	<i>Pellaea falcata</i>
<i>Cissus hypoglauca</i>	<i>Pittosporum undulatum</i>
<i>Citriobatus pauciflorus</i>	<i>Plectranthus parviflorus</i>
<i>Clayoxylon australe</i>	<i>Sarcopetalum harveyanum</i>
<i>Dendrocnide excelsa</i>	<i>Smilax australis</i>
<i>Diospyros australis</i>	<i>Stephania japonica</i>
<i>Doodia aspera</i>	<i>Streblus brunonianus</i>
<i>Eustrephus latifolius</i>	<i>Syzygium australe</i>
<i>Ficus</i> spp.	<i>Toona ciliata</i>
<i>Geitonoplesium cymosum</i>	

Table 2: Characteristic Plant and Tree Species from the Milton Ulladulla Subtropical Rainforest (NSW Department of Planning, Industry and Environment 2019).



Figure 8: 1959 Aerial image of the study area showing all vegetation has been cleared from the land.

3.2 Site Description

The study area is location on the side of a low ridge gently sloping to the west towards a small first order stream that drains into Pettys Creek. The ridgeline runs east to the coast at Mollymook/Ulladulla, and west to the ranges between Croobyar Creek to the

north, and Stoney Creek to the south. Lot 200 fronts onto Croobyar Road, and is located behind a cluster of residential lots, and a commercial lot that are east of Lot 200. Figure 9 and Figure 10 show two perspectives using a 3D model derived from LiDAR to illustrate the terrain conditions across the study area.



Figure 9: A 3D image looking north over the study area. LiDAR and basemap image © Department Finance, Services and Innovation.

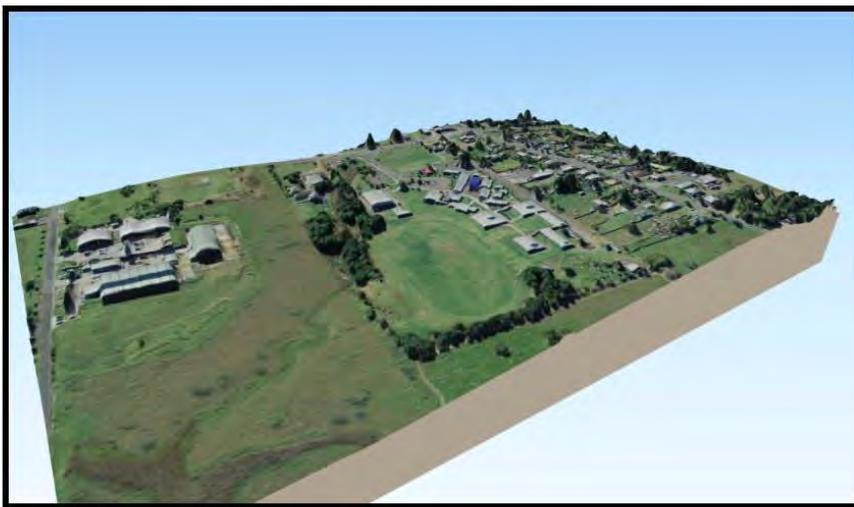


Figure 10: 3D model looking northeast over the study area 3D model of the study area derived from an aerial image overlaying a LiDAR derived DEM showing the terrain of the study area. LiDAR and basemap image © Department Finance, Services and Innovation.

The study area is within the lands of the Yuin people. The Yuin were displaced from their lands by the European colonisation of the South Coast.

3.3 The Archaeological Context

Previous archaeological studies for the South Coast and the hinterland have revealed that the coast and hinterland have been inhabited by Aboriginal people from the late Pleistocene. Pleistocene dates for habitation of have been obtained from the rock shelter at Burrill Lake (Lampert 1971) and the shell midden at nearby Bass Point (Bowdler 1970). Pleistocene dates have also been obtained from South Coast hinterland sites dating back to 19,000 years BP (Boot 2002:316).

During the early phase of occupation of the coast, during the late Pleistocene, the coastal shoreline was further east than it is today and the intertidal zone and the distance to the edge of the continental shelf was much narrower than it is today. Lampert and Hughes (1974) argued that the smaller intertidal coastal strip combined with the fishing technologies employed during the period, before 7000 to 5000 years BP, meant that limited resources would have been obtained from the coast. Callahan (1980) also described the importance of the shelf in providing habitats for a greater diversity and quantity of species, and given that Aboriginal people did not go out to sea to fish, the width of the shelf during the late Pleistocene would have significantly affected the availability of the resources. Lampert and Hughes argued that while the sea was rising, land based resources may have been more productive than those obtained from the coast, though Callahan (1980) argues that land based resources would not have been as available during the late Pleistocene as they were during the recent more stable Holocene. The coastal strip along the east coast of Australia during the late Pleistocene was also a much drier place and may have been sparsely populated (Bowdler 2010). Bowdler noted that along the entire east coast of Australia there are only three coastal sites recorded with Pleistocene dates, Burrill Lake, Bass Point and Wallen Wallen Creek, and the dates for Burrill Lake and Bass Point may not be reliable due to the difficulty associating the datable material with human occupation of the sites. Boot (2002:318) argued, on the basis of his study of the large sandstone shelters of South Coast hinterland, that during the terminal Pleistocene the hinterland was subjected to more intense occupation and resource exploitation than the nearby coastal areas.

Some coastal habitation sites used before the sea reached its present level are now likely to be submerged, as the shoreline 20000 years ago was between 100 and 150 metres lower than it is today, and in many cases would have been a significant distance east from where it is today (Lampert and Hughes 1974). The current sea level was reached between 7700, and 7900 years BP (Sloss, et al. 2007). The dates obtained

from most coastal and estuarine sites date from within this time and up to the recent past. In the Sydney area, which has been subjected to more coastal archaeological studies due to the more intensive coastal development, the ages of most occupation sites have been recorded as being within the last 3000 years (Attenbrow 2012).

Lampert and Hughes (1974) argued that in the last 5000 to 7000 years there was a much greater efficiency in the harvesting of marine food resources along the coast than during the preceding period. This was due to the new fishing technologies employed, included fish hooks and spears. When fishhooks began to appear in the archaeological deposits, there was found to be a correlating increase in the number of species of fish evident in the deposits (Lampert and Hughes 1974:230). Shell fishhooks first appear in the archaeology ca 1000 years ago (Attenbrow 2012). Lampert and Hughes (1974) found that from the stratigraphy from three excavated sites on the NSW coast that bone tipped spears came into use earlier than the shell fish hook. At the Currarong shelters 1, 2 and 3 excavated on the south coast near Nowra, a large number of bone points (46) were identified, most of which came from the upper spits of the shelter excavations. The base layers from these sites had maximum dates of 1790, and 3740 years BP (Lampert 1971). Attenbrow (2002:99) found excavation results from a range of coastal sites around Sydney showed the appearance of bone points from ca 2500 to 3000 years ago. With the arrival of technologies including the spear, line and hook, and the canoe, this enabled a greater exploitation of marine and estuarine resources along the coast (Lampert and Hughes 1974:230-231).

Changes in stone tool technology along the south coast show the arrival of the Bondaian industry and small tools, aligning with the technological changes that are evident for the greater Sydney Basin and east coast of the continent. At Burrill Lake simple scrapers are dominant during the early phases and then around 5000 BP shows the arrival of the Bondaian and small tools, including the presence of Bondi Points and the use of backing (Lampert 1971). Boot (2002:321) concluded that Pleistocene artefact assemblages in the South Coast hinterland are dominated by large flakes, cores and flake pieces, and will also include artefacts derived from pebbles and small flakes of quartz. Boot found that for Holocene assemblages, they mostly comprise of unmodified flakes and a small number of retouched and backed artefacts with little evidence of specialisation. Raw materials generally consisted of volcanic material and quartz and were derived from pebble cores sourced from nearby stream channels. Boot (2002:197) observed a trend where Holocene artefacts became smaller than the Pleistocene artefacts.

Archaeological research and ethnographic records indicate that the shoreline has a greater distribution and density of campsites and had a larger population than the hinterland (Lampert and Hughes 1974:231). Though this finding may no longer hold true today. Boot's (2002) review of ethnographic evidence found that a single social and economic group, the Yuin, occupied the coast, hinterland and Eastern Tablelands of the South Coast and that both the coast and hinterland were occupied throughout



the year. Boot found that there was no evidence to support seasonal changes in occupation, which had been hypothesised by earlier researchers.

Archaeological investigations of both open and closed sites on the coast has revealed that, as well as being sites of occupation, some sites were also used for human burials (Megaw 1968, Lampert 1971, Haglund 1977, Hope 2006). It is uncertain whether the role of sites changed between occupation and burial. Haglund (1977) found that there was no evidence of the abandonment of sites at the time of burials and there was no evidence of the use of burial pits.

Sullivan (1982) completed a study of midden sites along the east coast of New South Wales found that a key factor in the location of sites was the close proximity to fresh water. Proximity to high order streams has also been an important factor in the location of sites for studies carried out in Sydney and on the Cumberland Plain (White and McDonald 2010, Kohen 1987). Boot (2002:316-317) found that for the South Coast hinterland sites, higher density sites were associated with areas of high biodiversity, and that economies were focussed upon biodiverse woodlands and open forests. Boot's Holocene occupation model predicted that the most favourable occupation sites were in 'flat open areas within the river valley woodlands, and dry open forests.' Other areas predicted as favourable locations included open forest areas on broad ridges that had available water, and 'tall damp forest adjacent to rainforest (Boot 202:318).' On the basis of his own research and the assessment of other studies undertaken throughout the South Coast hinterland Boot (2002:319) predicted that the most intensively used sites were either within or close to woodlands within valleys of the larger rivers, and also distributed along the major ridge lines in the areas of drier forest. Boot (2002:317) concluded that Aboriginal people obtained resources from, and used, all of the landscapes and types of environments in the hinterland. The degree of use depended upon the economic returns from each landscape and environment.

Middens and coastal deposits represent both the marine and terrestrial resources that were part of the diet of the Aboriginal people. The results of archaeological excavations of deposits around Port Jackson and Broken Bay reveal that terrestrial mammals, birds and reptiles also contributed to the diet of the people living on the coast (Attenbrow 2002:70-76). The diet was not solely obtained from the marine and estuarine resources. Land and water mammals, birds and reptile bones were also found in the deposits at Currarong and Burrill Lake shelters on the south coast (Lampert 1971). The archaeological evidence also indicates that around 1500 to 700 years BP there was an increase in the use of mussels and small gastropods in the diet of Aboriginal people exploiting the resources along the coast (Boot 2002:82, Sullivan 1982:145-146). In the hinterlands of the South Coast, the most common ethnographically recorded foods used by the local Aboriginal people included *Macrozamia sp.* (cycad), Kangaroos, and fish as well as a variety of other marsupials, and plant species. On the coast the most commonly recorded foods were fish and possums (Boot 2002:82).



Key factors drawn from the research and our present understanding of the archaeology of the South Coast, lowlands and hinterland include:

- Available radiocarbon determinations indicate Aboriginal people have occupied the South Coast for potentially longer than 20,000 years;
- Aboriginal settlement patterns on the South Coast have been linked to a variety of environmental factors, including proximity to fresh water, and proximity to areas of high biodiversity;
- High density surface sites will occur on landform elements including broad open ridges, and flat areas closely associated with woodlands and major river valleys;
- Artefact distributions and sites may be found anywhere within the landscape but will generally be small and consist of low numbers of artefacts if they are not associated with the significant landscape features described in the previous point.

3.3.1 Previous Archaeological assessments

Archaeological investigations have been conducted within the zone of the extensive AHIMS search carried out for the study area. The outcomes of these studies are summarised as follows:

In 2001, a cultural heritage assessment was undertaken for the Milton/Ulladulla Sewerage Scheme from Narrawallee to Dolphin Point. Previous studies have recorded over 110 Aboriginal sites in the Milton/Ulladulla region primarily consisting of middens. Other site types include open camps, scarred trees, grinding grooves, rock shelters and a quarry. There are 14 Aboriginal sites and five historic sites situated in the study area. The study area overlies the Conjola formation which is characterized by elevated coastal headlands and ridges. Estuaries and lakes surround the area and small drainage lines and fluvial corridors stem from the coastal catchment. The study area has undergone extensive land disturbance which has potentially disrupted archaeological material. During the survey, two middens and two isolated finds were exposed. One of the middens was found on the southern edge of Narrawallee Inlet and the other on the upper slopes of the headland slopes on Bannisters Point. One of the isolated finds was located opposite to a dirt track in Blackburn Point. The second was found on the northern side of Kings Point Drive. In addition, 11 potential archaeological deposits were identified, five of which have high or moderate potential. Furthermore, an area adjacent to Lake Tabourie was identified as moderate to high potential. The potential archaeological deposits are generally found near lakes, tributaries and on dune ridges. Two historic sites were also found, consisting of a rail fence and potential tramway platform remnant. In 2002 the development area was relocated and consequently six new Aboriginal



recordings were made including two scarred trees, two artefact scatters, one isolated find and one potential archaeological deposit.

In 2001, a cultural heritage assessment was commissioned by Shoalhaven City Council and the Department of Land and Water Conservation to be undertaken in the Conjola Lake area. The archaeological sites predicted include open artefact scatters, occurring along elevated areas towards water sources. Furthermore, there is potential for isolated finds, middens, burials, quarries and potential archaeological deposits. The study area is mainly located on the upper slopes and crests of a major ridgeline between Washerwoman's Creek and Berringer Lake catchment. The geology is composed of conglomerates and sandstone bedrock from the Conjola formation. The vegetation consists of native eucalypts and shrubs but is somewhat disturbed from human activity. The survey area included the Northern Wastewater Treatment plant, Southern Wastewater Treatment Plant, wastewater pumping stations and Exfiltration site. No Aboriginal sites were found in these locations however, an Aboriginal site was located 30 m from the wastewater pumping station. The study area also included pipeline routes which resulted in 21 Aboriginal sites and isolated finds, two potential archaeological deposits, two historic sites and eight areas requiring monitoring. The pipeline routes cross over a variety of landscapes including some bushland, sections of lake Conjola and beach areas. The routes tend to be located in road verges and along easements through properties.

In 2004, Navin Officer Heritage Consultants undertook an archaeological subsurface testing program where Hazcorp Pty Ltd proposed to develop a residential suburb. A total of 415 lithic items were recovered. 129 of the items were identifiable as Aboriginal objects and 286 were nondescript lithic fragments or heat shattered rock. The items were composed of silcrete, quartzite, quartz and chalcedony. The assemblage represents an average density of artefacts for the area and indicates that the site was used for transient occupation. The proposed development location is on the coastal ranges west of Narrawallee Beach and overlies the Conjola formation resulting in a conglomerate and sandstone bedrock. Some clays are apparent towards the surface of an exposed ridge. The area is disturbed by human activity, particularly along the ridgeline and there is evidence of a quarry towards the south. The vegetation in the area is dominated by eucalypts and turpentine, however it has been mostly cleared. There are several natural sources of silcrete and quartzite. Most artefacts occurred in the upper layers of soil (0-40cm) and the highest density of material was located on the northern end of the spur line. There is a lack of cultural material on the slope of the spur line towards the drainage lines.

In 2005, Michael Therin, Robyn Farrell and Andrew Wellington undertook an Aboriginal Heritage survey for proposed upgrade of Croobyar Bridge near Milton. During the survey no Aboriginal sites were located, possibly due to the dense ground coverage. The site however has a high potential for sub-surface archaeology. Consequently, the entire area has been defined as a potential archaeological deposit. The study area is located either side of Croobyar Creek, west of the existing



bridge. Croobyar Creek is a major source of permanent, fresh water and contains two minor drainage lines at the south. The site is located on alluvial soil towards the south with a sandstone bedrock. It is extensively cleared with the only vegetation being pastures. There are 24 registered sites in the 5km surrounding the study area including, campsites, isolated finds and middens.

In 2005, Navin Officer Heritage Consultants Pty Ltd conducted an archaeological subsurface testing program for a proposed upgrade to a bridge at Croobyar Creek north of Milton. The study area is located on the Milton Monzonite intrusion, resulting in low, undulating slopes. There is silcrete on the coastal lowlands. Croobar Creek runs through the area, draining into the Tasman Sea. There are two minor tributaries running through the area towards Croobyar Creek. The area is dominated by native eucalypts forests and woodlands however European influence has resulted in the introduction of new species and land clearing. Previous studies of this study area showed no archaeological material however the entire area was declared as a potential archaeological deposit (PAD) due to its proximity to permanent water and archaeological sensitivity throughout the region. During this investigation a total 206 lithic items were recovered from 18 test pits in the PAD. The density of the artefacts was low for the region however there were localized concentrations of artefacts. The artefacts were predominantly composed of silcrete and quartz. The results of the testing indicate that the creek line was a focus of activity and occupation.

In 2005, Navin Officer Heritage Consultants Pty Ltd conducted an archaeological subsurface testing program for the Conjola Regional Sewerage Scheme. The study area overlies the Conjola Formation subgroup of the Shoalhaven Group. The underlying rocks consists of conglomerates and sandstone with gravel, sand and clay deposits. During the program, a total of 506 lithic items were recovered. 353 of the items were identifiable as Aboriginal artefacts and 153 were nondescript. The artefacts were predominantly composed of silcrete and quartz. The most common artefact type were flakes, lithic fragments and micro blades. Shell was recovered from a site situated on sand dunes next to the estuary. The areas that displayed the highest diversity and density in assemblages occur on coastal margins. There were also high-density assemblages at the upper reaches of Conjola Lake. While the density of the artefacts is relatively high, the ground was disturbed, particularly in the upper 15cm and was assessed as having low to moderate significance.

In 2006, South East Archaeology Pty Limited was commissioned by Elderslie Property Investments Pty Ltd to undertake an Aboriginal Heritage impact assessment in a residential development area called "Springfield Meadows" on the South Coast of NSW. In total, there were 323 stone artefacts found in the study area. The study area was divided into six sections based on environmental contexts and five showed potential to hold in situ deposits, all bordering Millards Creek. Springfield Meadows lies on the Conjola Formation and some of the Milton Monzonite. The area is in undulating, coastal lowlands with the northern boundaries containing a ridge crest. The underlying geology is composed of conglomerate and sandstones with silcrete

boulders occurring throughout the study area. The area is extensively cleared of vegetation; however, grasses and sporadic regrowth of native species occur towards the south. Previous studies surrounding Springfield Meadows indicate that scarred trees, rock shelters with deposits, carved trees and a quarry were among the most common sites, with the nearest being a scarred tree 200m northwest. Predictive models indicate that artefact scatters are the most common assemblage found in the study area and ceremonial sites, carved or scarred trees, grinding grooves, quarries, middens, occupational deposits and stone arrangements will be unlikely due to topography, distance from natural sources, and various environmental factors. The deposits were predominantly composed of silcrete with some quartzite, quartz, rhyolite, basalt or chert. The artefacts consist primarily of flakes and cores with some lithic fragments, hammerstones and retouched pieces. The artefact scatters were bordering Millards Creek and the only locations assessed as having potential in situ deposits are the hill slopes surrounding Millards Creek. There are also potential low-density assemblages further inland, however due to the distance from Millards Creek, the deposits are more likely to be disturbed with low archaeological value.

In 2006, an archaeological salvage was conducted for the Conjola Regional Sewerage Scheme, during which, a total of 900 stone artefacts were recovered from eight sites. The assemblages were composed of locally sourced silcrete with evidence of manufacture present at almost all sites. Some sites, with smaller assemblages didn't show evidence of hammerstones or cores, which were used to indicate on-site reduction in the larger assemblages. The study area overlies conglomerate and sandstones bedrock from the Conjola Formation. Seven of the salvage locations are near the coast on the elevated headlands, slopes and estuaries from small creeks. The remaining five are on the western estuarine shores of Conjola lake at elevated areas. The largest assemblage in the salvage was recovered from the western margin of Lake Conjola where 315 artefacts were found including elongated flakes, backed artefacts and retouched flakes. The salvage represents a higher than average density of artefacts compared to previous studies in the region.

3.4 Registered AHIMS Sites

A search of the Aboriginal Heritage Information Database was completed on the 24th of September 2020 for a 3km radius around the study area. The search returned 99 recorded Aboriginal sites (refer to Table 3). Figure 11 shows the sites plotted on a map in relation to the study area.

Site ID	Site name	Site features	Site types
58-1-0343	Burrill lake site 29	Shell, Artefact	Midden
58-1-0345	Burrill lake site 31	Artefact	Open Camp Site
58-1-0346	Burrill lake site 32	Shell, Artefact	Midden
58-1-0347	Burrill lake site 33	Artefact	Shelter with Deposit
58-1-0348	Burrill lake site 34	Shell, Artefact	Midden
58-1-0349	Burrill lake site 35	Shell, Artefact	Midden

58-1-0350	Burrill lake site 36	Shell, Artefact	Midden
58-1-0351	Burrill lake site 37	Shell, Artefact	Midden
58-1-0031	Milton;	Modified Tree (Carved or Scarred)	Carved Tree
58-1-0352	Burrill lake site 40	Shell, Artefact	Midden
58-1-0353	Burrill lake site 38	Shell, Artefact	Midden
58-1-0354	Burrill lake site 39	Shell, Artefact	Midden
58-1-0355	Burrill lake site 41	Shell, Artefact	Midden
58-1-0356	Burrill lake site 42	Shell, Artefact	Midden
58-1-0357	Burrill lake site 43	Artefact, Shell	Midden
58-1-0358	Burrill lake site 44	Shell, Artefact	Midden, Open Camp Site
58-1-0359	Burrill lake site 45	Shell, Artefact	Midden
58-1-0361	Burrill lake site 48	Shell, Artefact	Midden
58-1-0362	Burrill lake site 47	Shell, Artefact	Midden
58-1-0364	Burrill lake site 58	Shell, Artefact	Midden
58-1-0365	Burrill lake site 59	Shell, Artefact	Midden
58-1-0366	Burrill lake site 60	Shell, Artefact	Midden
58-1-0367	Burrill lake site 64	Shell, Artefact	Midden
58-1-0368	Burrill lake isolated find I	Artefact	Isolated Find
58-1-0369	Burrill lake isolated find J	Artefact	Isolated Find
58-1-0712	MUB1	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0713	MUB2	Artefact	Open Camp Site
58-1-0282	Burrill lake Site 51	Shell, Artefact	Midden
58-1-0283	Burrill lake site 52	Shell, Artefact	Midden
58-1-0285	Burrill lake site 54	Shell, Artefact	Midden
58-1-0286	Burrill lake site 55	Shell, Artefact	Midden
58-1-0287	Burrill lake site 57	Shell, Artefact	Midden
58-1-0709	MUB3	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0293	Burrill lake site 61	Shell, Artefact	Midden
58-1-0298	Burrill lake site 56	Shell, Artefact	Midden
58-1-0299	None Specified	Artefact	Open Camp Site
58-1-0635	Site 3;	Artefact	Open Camp Site
58-1-0638	Site 4;	Artefact	Open Camp Site
58-1-0639	Site 5;	Artefact	Open Camp Site
58-1-0642	Burrill L. Shelter 4;	Artefact	Shelter with Deposit
58-1-0643	Racecourse Creek 2;	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0644	Racecourse Creek 1;	Modified Tree (Carved or Scarred)	Scarred Tree

58-1-0078	Bannisters Point; Mollymook;	Stone Quarry, Artefact	Quarry
58-1-0026	Narrawalle Inlet; Conjola Beach;	Shell, Artefact	Midden
58-1-0027	Conjola Beach;	Shell, Artefact	Midden
58-1-0830	CS1	Artefact	
58-1-0831	CS2	Artefact	
58-1-0929	MUPHST	Modified Tree (Carved or Scarred) : 1	
58-1-0934	NW3 - Isolated Find	Potential Archaeological Deposit (PAD) : 0	
58-1-0935	NW5 (PADNW1)	Potential Archaeological Deposit (PAD), Artefact : 129	
58-1-0641	IF 2;	Artefact	Isolated Find
58-1-0363	Burrill lake site 49	Shell, Artefact	Midden
58-1-0727	Blocks 6 & 7	Artefact	Open Camp Site
58-1-0728	Narrawallee	Artefact	Open Camp Site
58-1-0932	NW3	Artefact : 1	
58-1-0930	NW1	Artefact : 7	
58-1-0931	NW2	Artefact : 1	
58-1-0968	PAD Croobyar Creek CCPHS	Potential Archaeological Deposit (PAD) : 1	
58-1-0969	PAD Croobyar Creek CCPHN	Potential Archaeological Deposit (PAD) : 1	
58-1-0958	CS22 - Lake Conjola Entrance Road 2	Modified Tree (Carved or Scarred) : 1	
58-1-0959	PAD3 (Conjola Sewerage Scheme)	Potential Archaeological Deposit (PAD) : 1	
58-1-0960	CS26 - Conjola Sewerage 26 and PAD5	Potential Archaeological Deposit (PAD) : 1, Artefact : 1	
58-1-0961	CS21 - Lake Conjola Entrance Road 1	Modified Tree (Carved or Scarred) : 1	
58-1-0963	CS23 Lake Conjola Isolated Find 4	Artefact : 1	
58-1-0964	NW4 (Narrawallee 4)	Artefact : 15	
58-1-1019	Springfield 3 (S3)	Artefact : 268	
58-1-0284	Burrill lake site 53	Shell, Artefact	Midden
58-1-0290	Burrill lake isolated find K	Artefact	Isolated Find
58-1-1041	Matron Porter Drive AS1	Artefact : 1	

58-1-1094	Garrad Reserve 1	Shell	
58-1-0719	Pattimores 1	Artefact	Open Camp Site
58-1-0720	MP1	Artefact	Open Camp Site
58-1-0721	LC IF2	Artefact	Isolated Find
58-1-0722	LC IF1	Artefact	Isolated Find
58-1-0723	Ulladulla STP 1	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0724	Ulladulla STP 2	Shell, Artefact	Midden, Open Camp Site
58-1-0725	Ulladulla STP 3	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0726	Ulladulla STP 4	Artefact	Open Camp Site
58-1-0718	Ulladulla Site	Artefact	Open Camp Site
58-1-0717	MUB4	Artefact	Open Camp Site
58-1-0729	GD1	Modified Tree (Carved or Scarred)	
58-1-0730	Conjola Spur 1	Artefact	
58-1-0822	MU1	Artefact	
58-1-0823	BANNISTERS POINT MIDDEN	Artefact	
58-1-0824	MU IF2	Artefact	
58-1-1006	Burril Lake Site 46	Shell	
58-1-1007	Springfield 1 (S1)	Artefact : 1, Shell : 1	
58-1-1008	Springfield 2 (S2)	Artefact : 1, Shell : 1	
58-1-1009	Springfield 3 (S3)	Artefact : 1, Shell : 1	
58-1-1010	Springfield 4 (S4)	Artefact : 1, Shell : 1	
58-1-1011	Springfield 5 (S5)	Artefact : 1, Shell : 1	
58-1-1012	Springfield 6 (S6)	Artefact : 1, Shell : 1	
58-1-1025	USP-OS-2 (formerly PAD 1 Ulladulla Sports Park)	Potential Archaeological Deposit (PAD) : 1, Artefact : 19	
58-1-1026	USP-IF-1	Artefact : 1, Potential Archaeological Deposit (PAD)	
58-1-1027	USP-OS-1	Artefact : 2, Potential Archaeological Deposit (PAD)	
58-1-1055	Narrawallee Creek Inlet	Artefact	
58-1-1056	Narrawallee Southern Reserve	Artefact	
58-1-1057	Narrawallee Southern Reserve 1	Artefact	
58-1-1095	Matron Porter Drive AS	Artefact	

Table 3: Registered AHIMS sites recorded within 3km radius of the study area.

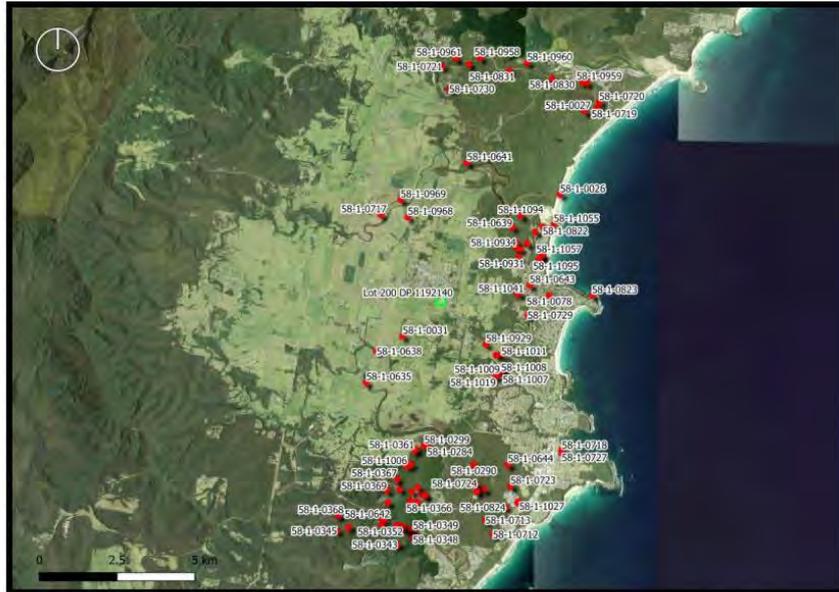


Figure 11: AHIMS sites plotted on a map showing the distributions in 3km radius around the study area (green). Source Sixmaps © Department Finance, Services and Innovation.

3.4.1 Discussion

A review of the results of previous studies undertaken within the locality and the registered sites on the AHIMS database suggests that sites may be found anywhere across the landscape. Sites may occur anywhere across the locality and are most likely to be middens close to the major waterways and coastline, or open sites consisting of artefact scatters, isolated artefacts and PADs along creeks, ridges, and lowland areas. There is also potential for scarred trees. All sites within the search area are recorded as open sites. There are no closed sites, or ceremonial sites recorded within the search area.

3.5 Predictive Model

The assessment of the archaeological potential of the site is based upon the assessment of the landscape and landform features, assessment of the environment aspects of the site including potential resource areas (Owen and Cowie 2017), the degree of the disturbance of the landscape, proximity to freshwater, and the review of the AHIMS site data and previous reports undertaken within the locality. It will be further informed by the consultation with Aboriginal knowledge holders.

3.5.1 Topography and proximity to water

The study area is located on gently sloping ground to the west on the side of a low ridgeline. A non-perennial first order stream passes along the western margin of Lot 200. The nearest higher order stream is Pettys Creek approximately 660 metres from the study area, and 900 metres from the proposed development footprint. Figure 12 shows the streams present in the vicinity of the study area.



Figure 12: Creeks shown within and around the study area. Streams data accessed from Spatial Services NSW. Source Sixmaps © Department Finance, Services and Innovation.

3.5.2 Economic Zones

A review of the spatial data, geology, soils and vegetation for the study area suggests that the area would have been an area of high bio-diversity, and is likely to have been an important economic zone (Boot 2002, Owen and Cowie 2017).

3.5.3 Scarred Trees

There is potential for scarred trees to be present within the locality however, by 1959 the study area had been completely cleared of all trees and vegetation (refer to Figure 8) which would have removed any scarred trees if they were present.

3.5.4 Rock Shelters

There are no rock shelters within the study area or in this part of the coastal lowlands and no shelters that have formed within the Milton Monzonite. All of the sites recorded within the search radius are open sites.

3.5.5 Grinding Grooves

Grinding grooves will normally be associated with the softer sandstone bedrock which is more suitable for producing ground edges on the harder edges of stone tools. For example grinding grooves are located on the sandstone platforms near Lake Conjola. There are no grinding grooves recorded on the Milton Monzonite.

3.5.6 Stone Raw Material Quarries and Source Locations

There are no known raw material sources or quarries within the study area. However studies undertaken within the locality have identified local sources of raw material including chert, silcrete and volcanic materials (Boot 2002, South East Archaeology 2006). Eighteen hatchets heads recovered from the Murramarang Point were composed of raw material sourced Milton (Boot 2002:341).

3.5.7 Ceremonial Grounds

There are no known ceremonial grounds at the site. The majority of the landscape surface at the site has been subject to modification for development and/or from earlier land clearing for grazing. There is unlikely to be visible remains of ceremonial structures (e.g. Bora Rings) at the site. Boot's (2002:293-324) research of sacred and ceremonial places of the hinterland considered ethnographic accounts, and earlier research, and found that there was a preference for ceremonial places in elevated areas, such as in the mountains of the hinterland, or elevated areas within a locality, though this was not exclusive. He also referred to nineteenth century ethnographic accounts of large gatherings for ceremonies that occurred on the alluvial terraces in the significant valleys and along the main rivers of the South Coast. The presence of this site type may be further informed by the Aboriginal traditional knowledge holders for the study area.

3.5.8 Burial

Most known burial sites recorded on the South Coast occur on the coast and shores of the inlets, including in the sand dunes, middens and within rock shelters (Megaw 1968, Lampert 1971, Haglund 1977, Hope 2006, Boot 2002).

3.5.9 Predictive Model Summary

Based upon the landscape topography, proximity to water, geology, environment, and the results of previous studies from the locality, the prediction for the site is for sites that include isolated or low density artefact concentrations. The study area is not associated with the landscape features that have been found to include higher concentrations of Aboriginal objects including river terraces in major valleys, broad ridgetop locations associated with water sources, or coastal areas associated with



fresh water sources. The study area is within an area that would have been an area of high biodiversity, however it is on gently sloping terrain and is not considered likely to have been camp or occupation site subject to repeated visitation. The presence of Aboriginal objects are more likely to have been associated with people moving through the landscape, using the low ridge as a travelling route between the coast and hinterland, and with procurement of resources in the area which is likely to have been a biodiverse environment.

3.6 Archaeological Survey

A pedestrian archaeological survey was undertaken at the study area on the 27th of October 2020. The survey was conducted with Lee Carriage representing the Ulladulla Local Area Land Council. The aims of the survey were to:

- Complete the survey in accordance with the requirements of Sections 2.2, 2.4, 2.5, 2.6, and 2.7 in the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH 2011).
- Determine if there are any significant landforms within the study area that indicate the likely presence of Aboriginal objects.
- Identify any Aboriginal objects present on the surface of the study area.
- Determine if any landforms of the survey area are likely to retain extant soil profiles that may contain Aboriginal objects and if there is a need to undertake archaeological test excavation.

Figure 13 shows the area covered by the pedestrian survey of the study area.



Figure 13: Pedestrian survey area shown in yellow hatching.

3.7 Survey Results

No Aboriginal sites or objects were found during the pedestrian survey and visual inspection of the ground surface. The ground surface of the site has been subjected to significant modification associated with the original construction of the school. This includes the forming of playing fields, parking areas and vehicle access, and the creation of level areas for building slabs. Two locations within the study area were considered likely to retain some intact natural soil profiles. Both areas were observed to have retained some of the natural profile of the original slope. One location is at the south of Lot 200 where the original agricultural plots are located. Whilst there is evidence of the surface having been disturbed from the agricultural activity, there is potential for the lower portion of the A horizon to be intact, and to retain cultural bearing deposit. The location is not within the development footprint. The second location is a small area south of the former preschool. This location is within the development footprint.



Figure 14: Locations within the study area with extant soil profiles.

3.8 Analysis and discussion

The study area is located away from major water sources. The study area is associated with a first order landscape with one minor intermittent first order watercourse on the west margin of Lot 200. The study area is also located close to the crest of the low ridge system that passes from Mollmook through to the high ridges of the hinterland in the Morton National Park. The ridge crest is considered to be a landscape feature likely to indicate the presence of Aboriginal objects. It is likely to have been a travelling route between the coast and mountains and is also in an area that would have been a high biodiversity rainforest and an important resource area.

With the exception of the two locations identified in Figure 14, soils at the study area have been subjected to significant disturbance as a result of historical land clearance, and the construction of the school. Figure 15 to Figure 18 shows hill-shade images derived from digital elevation models showing the extent of surface modification across the site as a result of previous development at the location. Minor spade tests were carried out within the development footprint to determine the presence of any surviving natural soils.

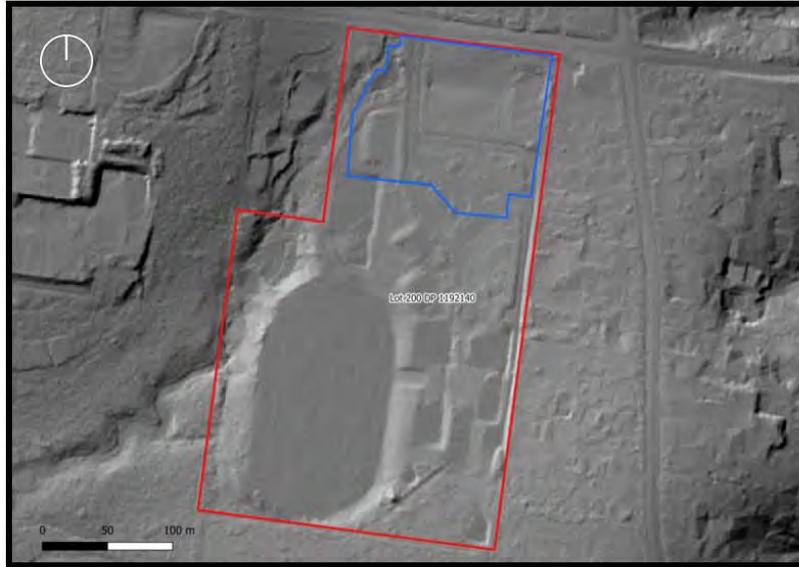


Figure 15: Hillshade image of the study area showing the extent of surface modification that has occurred at the site. The blue polygon represents the approximate area of the development footprint. Image derived from DEM © Department Finance, Services and Innovation.



Figure 16: Hillshade image of the study area showing the extent of surface modification and the red hatched areas representing the location of potential surviving soil profiles. Image derived from DEM © Department Finance, Services and Innovation.

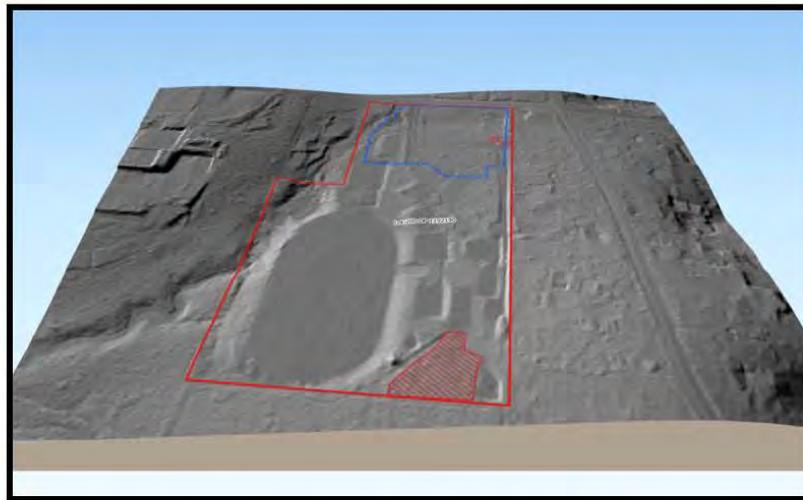


Figure 17: 3D view looking north across the study area showing the two areas with potential surviving soil profiles (red hatched areas). Image derived from DEM © Department Finance, Services and Innovation.

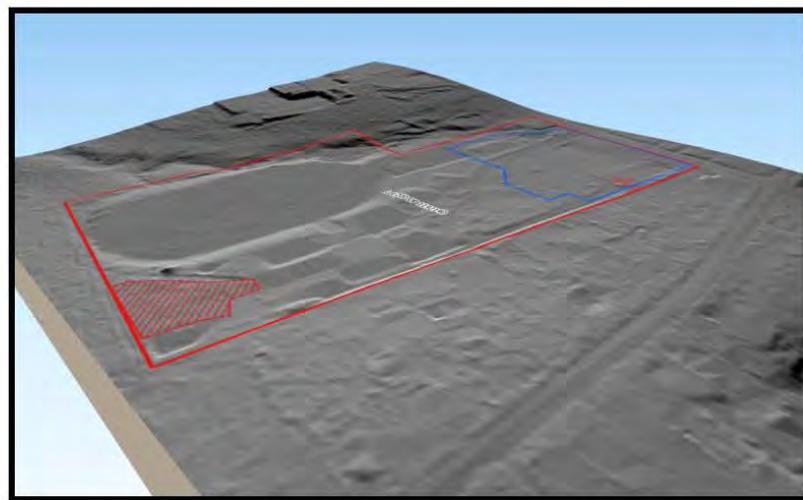


Figure 18: 3D view looking west across the study area showing the two areas with potential surviving soil profiles. Image derived from DEM © Department Finance, Services and Innovation.

When considering the soil disturbance categories used by the National Committee on Soil and Terrain as shown in Table 4, the areas of Lot 200 that are within the development footprint, with the exception of the identified area in Figure 14, would fall into the 8th category as being highly disturbed due to urban development impacts. The identified area would be considered category 5.

The majority of the proposed development footprint, with the exception of the identified area, would be considered as disturbed land in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales 2010*.

	SITE DISTURBANCE CATEGORY
0	No effective disturbance; natural
1	No effective disturbance other than grazing by hoofed animals
2	Limited clearing (e.g. selective logging)
3	Extensive clearing (e.g. poisoning, ringbarking)
4	Complete clearing; pasture, native or improved, but never cultivated
5	Complete clearing; pasture, native or improved, cultivated at some stage
6	Cultivation; rainfed
7	Cultivation; irrigated, past or present
8	Highly disturbed (e.g. quarrying, road works, mining, landfill, urban)

Table 4: Categories of Soil Disturbance (National Committee on Soil and Terrain 2009).

3.9 Test Excavation Program

There is potential for the proposed works to harm Aboriginal objects in the area identified as containing intact soil profiles. Land clearing and agricultural activity is likely to have disturbed the top 10 cm of soil, however there is potential for undisturbed soils beneath this layer that may contain Aboriginal objects within their original context. It is therefore recommended that the landscape be sampled with a test excavation program to validate the predictive model and determine the presence of Aboriginal objects. The remaining land within the development footprint is considered unlikely retain extant archaeological sites, objects, PAD or Places.

The test pit program will be undertaken in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (2010). The proposed methodology is to undertake a series of test pit excavations at the study area that sample the landscape feature. Test pits will be completed as 50cm x 50cm squares and will be spaced at 6 metres intervals. Figure 19 shows the location of the test pits. Test pits have been oriented in order to sample the entire area that contains potential extant soil profiles.

Excavated material will be wet sieved through a 5mm mesh. Test excavations will be carried out in accordance with requirement 16a of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW.



Figure 19: Test pit locations.

3.10 Timing

The test excavation program will commence immediately following the 28 day review period for the methodology. The test excavations are expected to be completed in one day. This will be followed by an analysis of the results and the completion of the technical report. It is anticipated that the final technical report and ACHAR will be provided to all stakeholders for review during December 2020 through January 2021. If there is a requirement for the preparation of an Aboriginal Heritage Impact Permit it is also anticipated that this will be prepared and submitted during January 2021.

3.11 Project Management

The test excavation program will be carried out under the supervision of a Tocomwall Senior Archaeologist.

4 References

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Re: Lot 200 DP 1192140 Budawang SSP, Croobyar Rd, Milton NSW, School infrastructure Projects - Methodology



Clive Freeman <clive.freeman@y7mail.com>

To: Danielle Mitchell

Reply

Reply All

Forward



Wed 4/11/2020 1:21 AM

 You forwarded this message on 4/11/2020 10:05 AM.

Hi Danielle,

This location is above an old campsite our family would visit. We have very strong connections to this area. The view to both Dithol and Bhewerre are of great significance. This Area holds a lot of stories connected to our family and the hills leading to the stringy bark forests were taught to us family to make the nets for king fish and bark canoes.

I would love for me and my sister to participate in this test pitting as this area is very strongly connected to our family. Ardler-Brown

Kind regards

Clive

Managing Director

Freeman&marx PtyLtd

Sent from my iPhone



**ULLADULLA LOCAL ABORIGINAL
LAND COUNCIL**

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Telephone: (02) 44 555883
Fax: (02) 44540440
Email: admin@ulladullalalc.com.au

03/12/2020

Re: Methodology Budawang School

The Ulladulla Local Aboriginal Land Council is happy with the recommendations/methodology suggested by Tocomwall Archaeology for the work being carried out at the Budawang School in Milton.

Shane Carriage

A handwritten signature in black ink, appearing to be 'S. Carriage'.

CEO
ULALC

Appendix 5 – Draft Aboriginal cultural heritage assessment

The draft ACHAR sent to the RAPs for review is this report. Some minor updates have been included to the record of consultation for the review of the final draft, in this final release of the ACHAR.

Letter send to RAPs for the review of the final draft of the ACHAR:

Budawang SSP, Lot 200 DP 1192140, Croobyar Rd, Milton NSW, School Infrastructure Projects - Draft ACHAR

 Danielle Mitchell
To: Will Moon

 You replied to this message on 16/12/2020 4:03 PM

 Draft report cover letter.pdf
292 KB

Dear knowledge holders,

Please find the draft ACHAR at the link below.

Here's a OneDrive link to [DRAFT Budawang SSP ACHAR V1 ToRAP.pdf](#).

Kind regards

Dani Mitchell

 Puliyapang
Archaeology & Heritage

 Tocomwall
Heritage & Cultural Services

Dani Mitchell | Senior Archaeologist
+61 496 676 510
Danielle.mitchell@puliyapang.com.au | Level 2, 2 Burbank Place, Norwest NSW 2153

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 Reply  Reply All  Forward 

Wed 16/12/2020 4:00 PM



Tocomwall Pty Ltd

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Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

16/12/2020

RE: Budawang SSP, Lot 200 DP 1192140, Croobyar Rd, Milton – Draft Aboriginal Cultural Heritage Assessment Report

Dear Knowledge Holder,

Please find attached a copy of the draft Aboriginal Cultural Heritage Assessment Report. In accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*, you now have the opportunity to review and provide feedback to the proponent within 28 days from receipt of this letter, no later than **13th January 2021**.

If you have any questions or wish to discuss the report, please do not hesitate to contact us:

Dani Mitchell: 0466 676 510

Will Moon: 0419 399 230

Yours Sincerely,

D. Mitchell

Dani Mitchell
Archaeologist

Lot 2
DP 1207216

Lot 14
DP 831988

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future



Written response the ACHAR review from the RAP:



From: Blaan Davies <blaan.davies@my.jcu.edu.au>
Sent: Friday, 18 December 2020 7:19 PM
To: Will Moon; Danielle Mitchell
Subject: Re: Budawang SSP, Lot 200 DP 1192140, Croobyar Rd, Milton NSW, School Infrastructure Projects - Draft ACHAR

Thanks for the update,

Regards

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From: Danielle Mitchell <danielle.mitchell@puliypang.com.au>
Sent: Wednesday, December 16, 2020 2:59:58 PM
To: Will Moon <william@tocomwall.com.au>
Subject: Budawang SSP, Lot 200 DP 1192140, Croobyar Rd, Milton NSW, School Infrastructure Projects - Draft ACHAR

Dear knowledge holders,

Please find the draft ACHAR at the link below.

Here's a OneDrive link to [DRAFT Budawang SSD.AHCAR.V1_ToRAP.pdf](#).

Kind regards

Dani Mitchell



Dani Mitchell | Senior Archaeologist
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✉ Danielle.mitchell@puliypang.com.au | Level 2, 2 Burbank Place, Norwest NSW 2153

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Appendix 6 – Archaeological report



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ABN: 13 137 694 618

ABORIGINAL ARCHAEOLOGICAL REPORT

Budawang SSP, Milton, NSW

Company	Schools Infrastructure NSW
Contact	Michael Stern
Date	December 2020

Integrating Landscape Science & Aboriginal Cultural Knowledge for Our Sustainable Future



Project Name	Aboriginal Cultural Heritage Assessment for Budawang SSP
Client Name	SINSW
Recipient	Registered Aboriginal Parties
Status	Version 1.0
Issue Date	December 2020
Prepared by	Will Moon
Approved by	Scott Franks

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Executive Summary

The proponent, Schools Infrastructure NSW is preparing a development application for the development of new premises for the relocation of the Budawang school from Ulladulla to Milton. The new school will be located on the site of the former Anglican School at Croobyar Road in Milton, NSW. The proposed development is considered state significant development and the application under the Planning Secretaries Environmental Requirements is SD-8845345. The environmental assessment requirements include the completion of an Aboriginal Cultural Heritage Assessment Report (ACHAR). This document is the archaeological technical report that describes the results of the archaeological test excavation undertaken at the study area.

1 Introduction

1.1 Background

Tocomwall Pty Ltd have been engaged by Schools Infrastructure NSW (SINSW) to undertake an Aboriginal Cultural Heritage Assessment in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW 2010*. This methodology has been prepared in accordance with the requirements of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, 2010*.

1.1.1 Statutory Heritage Contexts and Controls

Two primary pieces of legislation provide automatic statutory protection for Aboriginal heritage and the requirements for its management in New South Wales.

These are:

- The *National Parks and Wildlife Act 1974* (NPW Act); and
- The *Environmental Planning and Assessment Act 1979*.

1.1.1.1 National Parks and Wildlife Act 1974

The primary legislation for the protection of Aboriginal culture and heritage in NSW is the *NPW Act*. One of the key objectives stated in the *NPW Act* is:

'..... the conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including but not limited to: (i) places, objects and features of significance to Aboriginal people.... [s.2A (1) (6)].'

The *NPW Act* defines Aboriginal Heritage as comprising 'Aboriginal objects' and 'Aboriginal Places'. Aboriginal heritage is defined as:

- An object under the NPW Act is defined as ‘any deposit, or object or material evidence relating to the Aboriginal habitation of the area’ (Section 5 of the NPW Act); and
- An Aboriginal Place is defined as ‘a place that is or was of special significance with respect to Aboriginal culture’ (Section 84 of the NPW Act).

Part 6 of the NPW Act provides specific protection for Aboriginal objects and declared Aboriginal Places by establishing offences of harm. Harm is defined as ‘..destroying, defacing or damaging an Aboriginal object or place, or moving an object from the land.’ There are fines associated with causing harm to an Aboriginal object. However, there are exemptions for causing harm, for example the preparation of an Aboriginal Heritage Impact Permit (AHIP).

The Department of Planning, Industry and Environment (DPIE) is the current government agency with responsibility for the protection and management of Aboriginal archaeological sites and cultural heritage values and the statutory administration of the NPW Act.

1.1.1.2 Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EPA Act) establishes the statutory planning framework for environmental and land use planning in NSW through *State Environmental Planning Policies* (SEPPs), *Regional Environmental Plans* (REPs) and *Local Environmental Plans* (LEPs).

The EPA Act also establishes the framework for Aboriginal heritage values to be formally assessed in land use planning and development consent processes. The requirements for the project are defined in the Planning Secretary’s Environmental Assessment requirements for application number SSD-10445.

1.1.1.3 Native Title Act 1993

The Native Title Act 1993 provides the legal framework to recognition and protection of native title. It includes the recognition of the traditional rights and interests to land and waters of Aboriginal and Torres Strait Islander people. Under the Native Title Act, native title claimants can make an application to the Federal Court to have their native title recognised by Australian law.

As part of the consultation process for the project it was confirmed that there are no registered native title claimants for the study area.

1.1.1.4 Reporting Standards and Guidelines

This report has been prepared in accordance with the following heritage recording, assessment and reporting guidelines and standards that are endorsed by the OEH:

- Australia ICOMOS. 2013. The Burra Charter. The Australia ICOMOS Charter for Places of Cultural Significance. Australia ICOMOS Inc.¹

¹ The Burra Charter establishes nationally accepted principles for the conservation of places of cultural significance.

- NSW Department of Environment, Climate Change & Water. (DECCW) 2010a. Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales. DECCW. Sydney.
- NSW Department of Environment, Climate Change & Water. (DECCW) 2010b (September). Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales. DECCW. Sydney.

1.2 Objectives of the Aboriginal Heritage Assessment

The objectives of the Aboriginal Heritage assessment are to:

- Implement the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 with the objective of identifying and engaging Aboriginal knowledge holders for the study area.
- Review previous archaeological studies undertaken in the vicinity.
- Review the landscape context to help inform the predictive model.
- Summarise and discuss the local and regional character of Aboriginal land use and its material traces.
- Predict the nature and extent of archaeological evidence at the site.
- Undertake an archaeological survey and record the presence and extent of Aboriginal objects that are present in the study area.
- Involve the Aboriginal knowledge holders in the cultural heritage assessment process, including consultation to determine their opinions with respect to the project and its potential 'harm' to their cultural heritage and measures to protect their cultural heritage.
- Determine if there is a need to extend the investigation to undertake test excavations.
- Determine the nature and extent of the impacts of the proposed development upon the Aboriginal cultural heritage of the study area.
- Make recommendations for the protection of Aboriginal cultural heritage at the study area.

2 Description of the Study Area

2.1 Location and Proposed Development

The proposed development of the Budawang SSP is located at Lot 200 in D.P. 1192140. It is the site of the former Anglican school at Croobyar Road in Milton, NSW, close to the intersection of Croobyar Road with the Princes Highway. The site has been used for educational purposes since at least the early 1990s when the Croobyar Christian School opened. After closure of the Croobyar School the site was acquired by

the Shoalhaven Anglican School, who further expanded the facilities, with the most recent buildings on site being constructed as recently as 2015 (Group GSA 2020). Figure 1 to Figure 4 show the layout of the existing buildings within the study area, buildable areas within the site, and the location and proposed arrangement for the Budawang SSP.



Figure 1: Layout of existing buildings within the study area (Group GSA 2020).



Figure 2: Locations considered as buildable areas within the study area (Group GSA 2020).



Figure 3: Budawang SSP site location (Group GSA 2020).

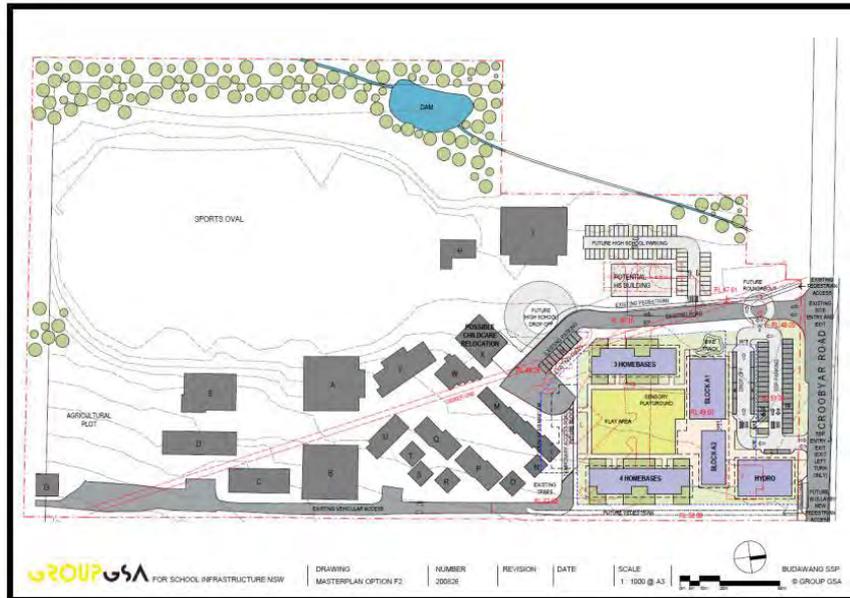


Figure 4: Masterplan option showing the locations of new buildings (Group GSA 2020).

3 Methodology

The following defines the proposed methodology for the Aboriginal Cultural Heritage Assessment (ACHA) as a requirement of the Planning Secretary’s Environmental Assessment Requirements for the Budawang SSP development. The ACHA will be carried out in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010, Aboriginal cultural heritage consultation requirements for proponents 2010, the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011 and Applying for an Aboriginal Heritage Impact Permit: Guide for applicants 2011. The methodology is depicted in Figure 5: ACHA Methodology. The Steps are described in more detail in Table 1.

Step	Method
1: Initiate Consultation Process	The consultation process is initiated in accordance with Aboriginal cultural heritage consultation requirements for proponents 2010.
2: Review previous archaeological work	Review previous archaeological work in accordance with the requirements of Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010. The review of previous archaeological work is defined in 3.3.1 Previous Archaeological assessments.

3: Review the landscape context	The review of the landscape context is defined in sections 3.1 The Environmental Context and 3.2 Site Description and is completed in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
4: Discuss the local and regional character of Aboriginal land use and its material traces	The local and regional character of Aboriginal land use and its material traces is described in section 3.3 The Archaeological Context and in Attachment 1 , the Archaeological Report which has been prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
5: Predict the nature and distribution of evidence	A predictive model is described in 3.5 Predictive Model and has been prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010.
6: Undertake an archaeological survey	An archaeological survey of the study area was undertaken on Friday the 24 th of July in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010. The results of the survey are described in the archaeological report (Attachment A).
7: Decide if additional archaeological investigation is required?	Refer to the archaeological report (Attachment A). The archaeological assessment and results described in attachment A determined that it is appropriate to undertake further archaeological investigation at the study area. A test excavation program is proposed for the study area.
8: Document findings and interpretation of results in an Archaeological Report	Refer to the archaeological report (Attachment A). Report prepared in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010. This report will be expanded upon following the outcomes of the test excavation program for the study area.
9: Seek cultural information from Registered Aboriginal Parties	Information on the cultural information for the study area is sought during the methodology review and as per requirement 3 of the Aboriginal cultural heritage consultation requirements for proponents 2010. Information gathered includes places of social, spiritual and cultural value, historic places with cultural significance, and potential places/areas of historic, social, spiritual and/or cultural significance. Information gathered will be used to further inform how the landscape was used, the social, cultural, aesthetic, historic and scientific values to enable an overall assessment of the significance of the study area and the associated values. Assessing values and significance will be undertaken as per section 2.4.2 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011.



10: Determine if there will be harm to cultural heritage	Harm, or potential harm will be assessed as per section 2.5 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011. Assessing measures to avoid harm will be considered in accordance with sections 2.6 and 2.7 from the same guide. Registered Aboriginal knowledge holders will be consulted during this process as per the Aboriginal cultural heritage consultation requirements for proponents 2010 to help determine management options and mitigation measures.
11: Complete ACHAR	An Aboriginal Cultural Heritage Assessment Report will be prepared in accordance with section 3 of the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011.
12: Complete and Submit AHIP if required	If there is a requirement to request an Aboriginal Heritage Impact Permit, this will be done in accordance with Applying for an Aboriginal Heritage Impact Permit: Guide for applicants 2011.

Table 1: ACHA Methodology

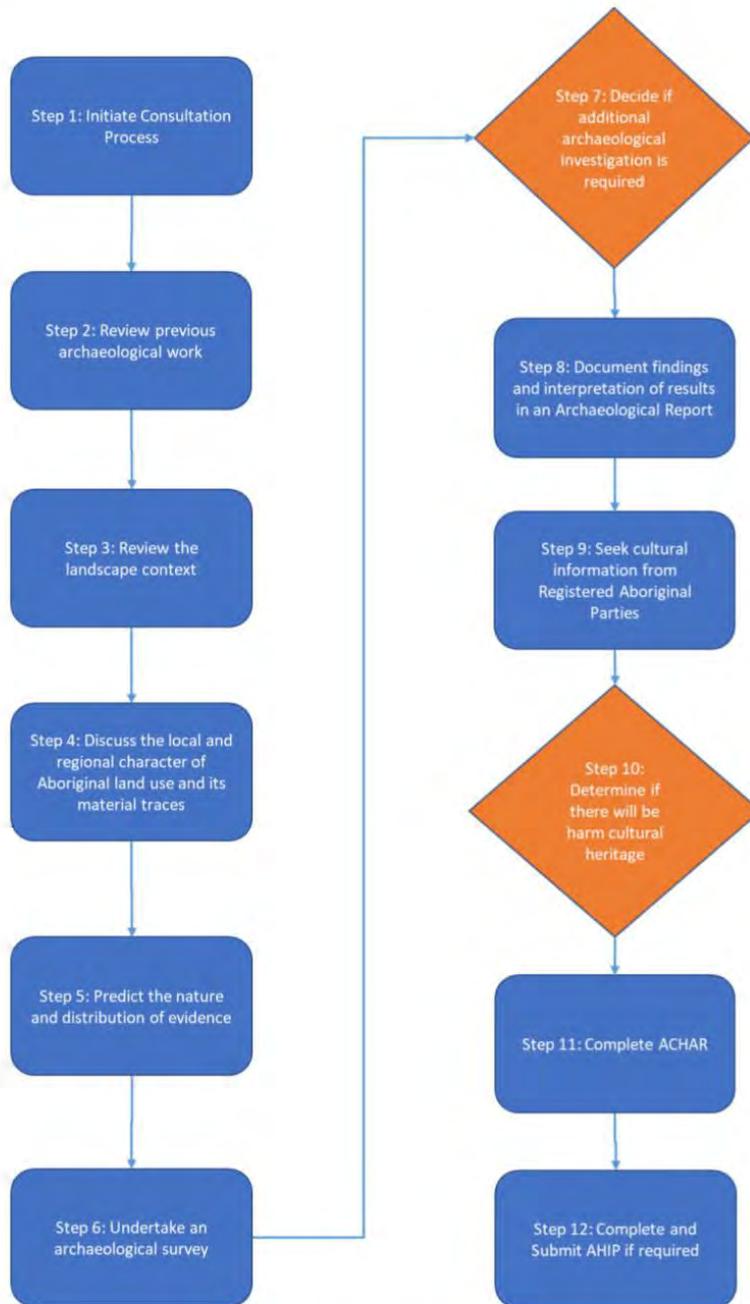


Figure 5: ACHA Methodology

3.1 The Environmental Context

The study area is located within the lowland areas of the South Coast of New South Wales. The landscape of the local and surrounding area can be characterised undulating topography, with landform elements including flats, very gentle to steep slopes, low rises and ridgelines, and crests. The surface geology is part of the Milton Monzonite an igneous intrusion from the Mesozoic (NSW Department of Mines 1966).



Figure 6: Geological map showing the study area over the Milton Monzonite (Mmm).
Source Geological map overlay © New South Wales Government, Australia.

The terrain and soils of the study area are described in the Digital Atlas of Australian Soils as Me1: Hilly with some steep slopes and small graded valleys: moderately steep rounded hills of brown and red friable earths (*Gn3.21 and Gn3.22 and Gn3.11 and Gn3.12*) in association with less rounded hill slopes of hard acidic yellow mottled soils (*Dy3.41*), hard acidic red soils (*Dr2.21*), and yellow leached earths (*Gn3.54*), and also other hill slopes of loamy soils having an A2 horizon (*Um4.2*) with yellow-brown earths (*Gn2.44*) (Northcote *et al.* 1960-68).

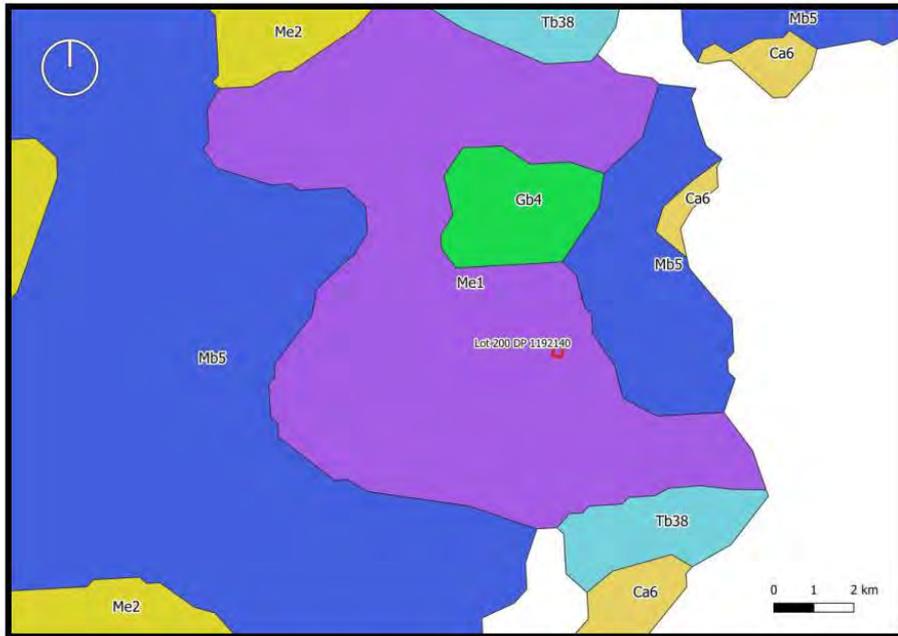


Figure 7: Map of the soil category of the study area. Budawang SSP is located within the purple area representing the Me1 soils (Source Australian Soil Resource Information System).

The vegetation of the study area has been significantly modified by historic European land management practices. Figure 8 shows an aerial image of the study area taken in 1959. All vegetation had been removed from the study area by this time. The study area is most likely to have been originally covered with the critically endangered Milton Ulladulla Subtropical Rainforest. This rainforest community occurs on the soils derived from the Milton Monzonite, and soils derived from the Conjola formation that have been enriched by the basaltic Monzonite soils. Table 2 shows a list of species of plants and trees that are characteristic of the rainforest however the overall number of species is much greater than listed in this table. This is the southern limit for a number of the rainforest species that occur and that are rare on the South Coast (NSW Department of Planning, Industry and Environment 2019).

<i>Acmena smithii</i>	<i>Gymnostachys anceps</i>
<i>Adiantum flabellifolium</i>	<i>Legnephora moorei</i>
<i>Alectryon subcinereus</i>	<i>Malaisia scandens</i>
<i>Aphanopetalum resinosum</i>	<i>Marsdenia rostrata</i>
<i>Arthropteris tenella</i>	<i>Notelaea venosa</i>
<i>Baloghia inophylla</i>	<i>Oplismenus imbecillus</i>

<i>Breynia oblongifolia</i>	<i>Pandorea pandorana</i>
<i>Cissus antarctica</i>	<i>Pellaea falcata</i>
<i>Cissus hypoglauca</i>	<i>Pittosporum undulatum</i>
<i>Citriobatus pauciflorus</i>	<i>Plectranthus parviflorus</i>
<i>Clayoxylon australe</i>	<i>Sarcopetalum harveyanum</i>
<i>Dendrocnide excelsa</i>	<i>Smilax australis</i>
<i>Diospyros australis</i>	<i>Stephania japonica</i>
<i>Doodia aspera</i>	<i>Streblus brunonianus</i>
<i>Eustrephus latifolius</i>	<i>Syzygium australe</i>
<i>Ficus</i> spp.	<i>Toona ciliata</i>
<i>Geitonoplesium cymosum</i>	

Table 2: Characteristic Plant and Tree Species from the Milton Ulladulla Subtropical Rainforest (NSW Department of Planning, Industry and Environment 2019).



Figure 8: 1959 Aerial image of the study area showing all vegetation has been cleared from the land. Source Spatial Services NSW Government.

3.2 Site Description

The study area is location on the side of a low ridge gently sloping to the west towards a small first order stream that drains into Pettys Creek. The ridgeline runs east to the coast at Mollymook/Ulladulla, and west to the ranges between Croobyar Creek to the

north, and Stoney Creek to the south. Lot 200 fronts onto Croobyar Road, and is located behind a cluster of residential lots, and a commercial lot that are east of Lot 200. Figure 9 and Figure 10 show two perspectives using a 3D model derived from LiDAR to illustrate the terrain conditions across the study area.

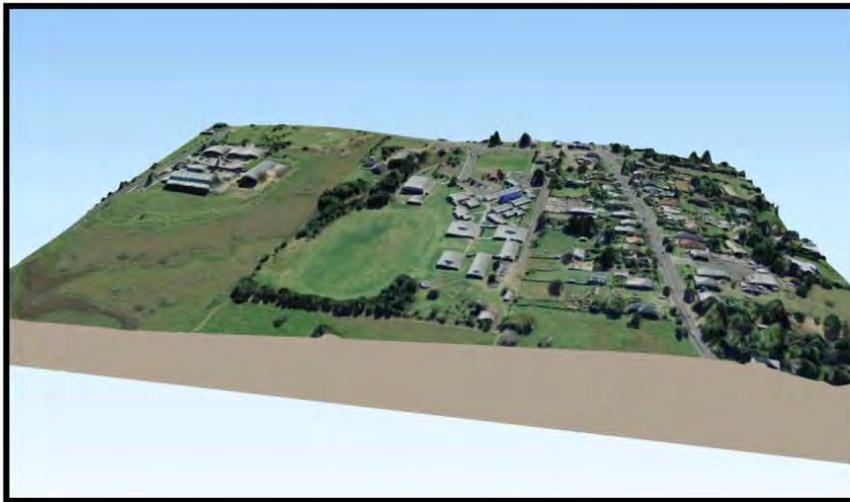


Figure 9: A 3D image looking north over the study area. LiDAR and basemap image © Department Finance, Services and Innovation.

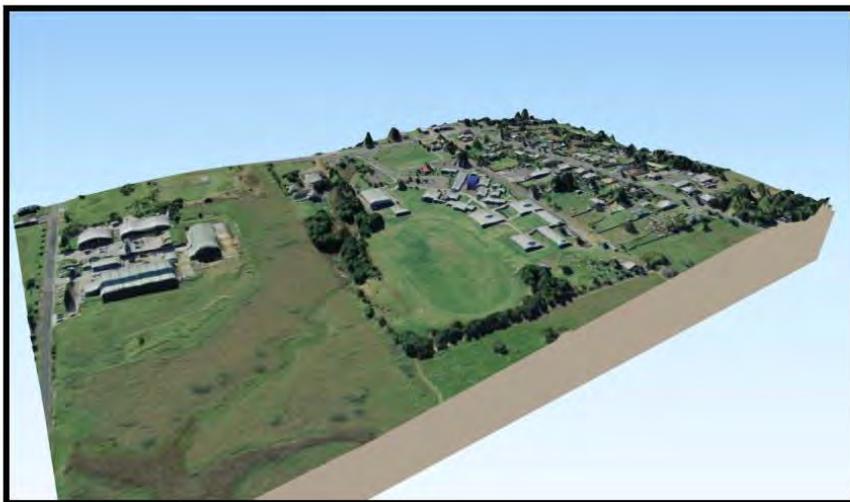


Figure 10: 3D model looking northeast over the study area 3D model of the study area derived from an aerial image overlaying a LiDAR derived DEM showing the terrain of the study area. LiDAR and basemap image © Department Finance, Services and Innovation.

The study area is within the lands of the Yuin people. The Yuin were displaced from their lands by the European colonisation of the South Coast.

3.3 The Archaeological Context

Previous archaeological studies for the South Coast and the hinterland have revealed that the coast and hinterland have been inhabited by Aboriginal people from the late Pleistocene. Pleistocene dates for habitation of have been obtained from the rock shelter at Burrill Lake (Lampert 1971) and the shell midden at nearby Bass Point (Bowdler 1970). Pleistocene dates have also been obtained from South Coast hinterland sites dating back to 19,000 years BP (Boot 2002:316).

During the early phase of occupation of the coast, during the late Pleistocene, the coastal shoreline was further east than it is today and the intertidal zone and the distance to the edge of the continental shelf was much narrower than it is today. Lampert and Hughes (1974) argued that the smaller intertidal coastal strip combined with the fishing technologies employed during the period, before 7000 to 5000 years BP, meant that limited resources would have been obtained from the coast. Callahan (1980) also described the importance of the shelf in providing habitats for a greater diversity and quantity of species, and given that Aboriginal people did not go out to sea to fish, the width of the shelf during the late Pleistocene would have significantly affected the availability of the resources. Lampert and Hughes argued that while the sea was rising, land based resources may have been more productive than those obtained from the coast, though Callahan (1980) argues that land based resources would not have been as available during the late Pleistocene as they were during the recent more stable Holocene. The coastal strip along the east coast of Australia during the late Pleistocene was also a much drier place and may have been sparsely populated (Bowdler 2010). Bowdler noted that along the entire east coast of Australia there are only three coastal sites recorded with Pleistocene dates, Burrill Lake, Bass Point and Wallen Wallen Creek, and the dates for Burrill Lake and Bass Point may not be reliable due to the difficulty associating the datable material with human occupation of the sites. Boot (2002:318) argued, on the basis of his study of the large sandstone shelters of South Coast hinterland, that during the terminal Pleistocene the hinterland was subjected to more intense occupation and resource exploitation than the nearby coastal areas.

Some coastal habitation sites used before the sea reached its present level are now likely to be submerged, as the shoreline 20000 years ago was between 100 and 150 metres lower than it is today, and in many cases would have been a significant distance east from where it is today (Lampert and Hughes 1974). The current sea level was reached between 7700, and 7900 years BP (Sloss, et al. 2007). The dates obtained

from most coastal and estuarine sites date from within this time and up to the recent past. In the Sydney area, which has been subjected to more coastal archaeological studies due to the more intensive coastal development, the ages of most occupation sites have been recorded as being within the last 3000 years (Attenbrow 2012).

Lampert and Hughes (1974) argued that in the last 5000 to 7000 years there was a much greater efficiency in the harvesting of marine food resources along the coast than during the preceding period. This was due to the new fishing technologies employed, included fish hooks and spears. When fishhooks began to appear in the archaeological deposits, there was found to be a correlating increase in the number of species of fish evident in the deposits (Lampert and Hughes 1974:230). Shell fishhooks first appear in the archaeology ca 1000 years ago (Attenbrow 2012). Lampert and Hughes (1974) found that from the stratigraphy from three excavated sites on the NSW coast that bone tipped spears came into use earlier than the shell fish hook. At the Currarong shelters 1, 2 and 3 excavated on the south coast near Nowra, a large number of bone points (46) were identified, most of which came from the upper spits of the shelter excavations. The base layers from these sites had maximum dates of 1790, and 3740 years BP (Lampert 1971). Attenbrow (2002:99) found excavation results from a range of coastal sites around Sydney showed the appearance of bone points from ca 2500 to 3000 years ago. With the arrival of technologies including the spear, line and hook, and the canoe, this enabled a greater exploitation of marine and estuarine resources along the coast (Lampert and Hughes 1974:230-231).

Changes in stone tool technology along the south coast show the arrival of the Bondaian industry and small tools, aligning with the technological changes that are evident for the greater Sydney Basin and east coast of the continent. At Burrill Lake simple scrapers are dominant during the early phases and then around 5000 BP shows the arrival of the Bondaian and small tools, including the presence of Bondi Points and the use of backing (Lampert 1971). Boot (2002:321) concluded that Pleistocene artefact assemblages in the South Coast hinterland are dominated by large flakes, cores and flake pieces, and will also include artefacts derived from pebbles and small flakes of quartz. Boot found that for Holocene assemblages, they mostly comprise of unmodified flakes and a small number of retouched and backed artefacts with little evidence of specialisation. Raw materials generally consisted of volcanic material and quartz and were derived from pebble cores sourced from nearby stream channels. Boot (2002:197) observed a trend where Holocene artefacts became smaller than the Pleistocene artefacts.

Archaeological research and ethnographic records indicate that the shoreline has a greater distribution and density of campsites and had a larger population than the hinterland (Lampert and Hughes 1974:231). Though this finding may no longer hold true today. Boot's (2002) review of ethnographic evidence found that a single social and economic group, the Yuin, occupied the coast, hinterland and Eastern Tablelands of the South Coast and that both the coast and hinterland were occupied throughout

the year. Boot found that there was no evidence to support seasonal changes in occupation, which had been hypothesised by earlier researchers.

Archaeological investigations of both open and closed sites on the coast has revealed that, as well as being sites of occupation, some sites were also used for human burials (Megaw 1968, Lampert 1971, Haglund 1977, Hope 2006). It is uncertain whether the role of sites changed between occupation and burial. Haglund (1977) found that there was no evidence of the abandonment of sites at the time of burials and there was no evidence of the use of burial pits.

Sullivan (1982) completed a study of midden sites along the east coast of New South Wales found that a key factor in the location of sites was the close proximity to fresh water. Proximity to high order streams has also been an important factor in the location of sites for studies carried out in Sydney and on the Cumberland Plain (White and McDonald 2010, Kohen 1987). Boot (2002:316-317) found that for the South Coast hinterland sites, higher density sites were associated with areas of high biodiversity, and that economies were focussed upon biodiverse woodlands and open forests. Boot's Holocene occupation model predicted that the most favourable occupation sites were in 'flat open areas within the river valley woodlands, and dry open forests.' Other areas predicted as favourable locations included open forest areas on broad ridges that had available water, and 'tall damp forest adjacent to rainforest (Boot 202:318).' On the basis of his own research and the assessment of other studies undertaken throughout the South Coast hinterland Boot (2002:319) predicted that the most intensively used sites were either within or close to woodlands within valleys of the larger rivers, and also distributed along the major ridge lines in the areas of drier forest. Boot (2002:317) concluded that Aboriginal people obtained resources from, and used, all of the landscapes and types of environments in the hinterland. The degree of use depended upon the economic returns from each landscape and environment.

Middens and coastal deposits represent both the marine and terrestrial resources that were part of the diet of the Aboriginal people. The results of archaeological excavations of deposits around Port Jackson and Broken Bay reveal that terrestrial mammals, birds and reptiles also contributed to the diet of the people living on the coast (Attenbrow 2002:70-76). The diet was not solely obtained from the marine and estuarine resources. Land and water mammals, birds and reptile bones were also found in the deposits at Currarong and Burrill Lake shelters on the south coast (Lampert 1971). The archaeological evidence also indicates that around 1500 to 700 years BP there was an increase in the use of mussels and small gastropods in the diet of Aboriginal people exploiting the resources along the coast (Boot 2002:82, Sullivan 1982:145-146). In the hinterlands of the South Coast, the most common ethnographically recorded foods used by the local Aboriginal people included *Macrozamia sp.* (cycad), Kangaroos, and fish as well as a variety of other marsupials, and plant species. On the coast the most commonly recorded foods were fish and possums (Boot 2002:82).



Key factors drawn from the research and our present understanding of the archaeology of the South Coast, lowlands and hinterland include:

- Available radiocarbon determinations indicate Aboriginal people have occupied the South Coast for potentially longer than 20,000 years;
- Aboriginal settlement patterns on the South Coast have been linked to a variety of environmental factors, including proximity to fresh water, and proximity to areas of high biodiversity;
- High density surface sites will occur on landform elements including broad open ridges, and flat areas closely associated with woodlands and major river valleys;
- Artefact distributions and sites may be found anywhere within the landscape but will generally be small and consist of low numbers of artefacts if they are not associated with the significant landscape features described in the previous point.

3.3.1 *Previous Archaeological assessments*

Archaeological investigations have been conducted within the zone of the extensive AHIMS search carried out for the study area. The outcomes of these studies are summarised as follows:

In 2001, a cultural heritage assessment was undertaken for the Milton/Ulladulla Sewerage Scheme from Narrawallee to Dolphin Point. Previous studies have recorded over 110 Aboriginal sites in the Milton/Ulladulla region primarily consisting of middens. Other site types include open camps, scarred trees, grinding grooves, rock shelters and a quarry. There are 14 Aboriginal sites and five historic sites situated in the study area. The study area overlies the Conjola formation which is characterized by elevated coastal headlands and ridges. Estuaries and lakes surround the area and small drainage lines and fluvial corridors stem from the coastal catchment. The study area has undergone extensive land disturbance which has potentially disrupted archaeological material. During the survey, two middens and two isolated finds were exposed. One of the middens was found on the southern edge of Narrawallee Inlet and the other on the upper slopes of the headland slopes on Bannisters Point. One of the isolated finds was located opposite to a dirt track in Blackburn Point. The second was found on the northern side of Kings Point Drive. In addition, 11 potential archaeological deposits were identified, five of which have high or moderate potential. Furthermore, an area adjacent to Lake Tabourie was identified as moderate to high potential. The potential archaeological deposits are generally found near lakes, tributaries and on dune ridges. Two historic sites were also found, consisting of a rail fence and potential tramway platform remnant. In 2002 the development area was relocated and consequently six new Aboriginal



recordings were made including two scarred trees, two artefact scatters, one isolated find and one potential archaeological deposit.

In 2001, a cultural heritage assessment was commissioned by Shoalhaven City Council and the Department of Land and Water Conservation to be undertaken in the Conjola Lake area. The archaeological sites predicted include open artefact scatters, occurring along elevated areas towards water sources. Furthermore, there is potential for isolated finds, middens, burials, quarries and potential archaeological deposits. The study area is mainly located on the upper slopes and crests of a major ridgeline between Washerwoman's Creek and Berringer Lake catchment. The geology is composed of conglomerates and sandstone bedrock from the Conjola formation. The vegetation consists of native eucalypts and shrubs but is somewhat disturbed from human activity. The survey area included the Northern Wastewater Treatment plant, Southern Wastewater Treatment Plant, wastewater pumping stations and Exfiltration site. No Aboriginal sites were found in these locations however, an Aboriginal site was located 30 m from the wastewater pumping station. The study area also included pipeline routes which resulted in 21 Aboriginal sites and isolated finds, two potential archaeological deposits, two historic sites and eight areas requiring monitoring. The pipeline routes cross over a variety of landscapes including some bushland, sections of lake Conjola and beach areas. The routes tend to be located in road verges and along easements through properties.

In 2004, Navin Officer Heritage Consultants undertook an archaeological subsurface testing program where Hazcorp Pty Ltd proposed to develop a residential suburb. A total of 415 lithic items were recovered. 129 of the items were identifiable as Aboriginal objects and 286 were nondescript lithic fragments or heat shattered rock. The items were composed of silcrete, quartzite, quartz and chalcedony. The assemblage represents an average density of artefacts for the area and indicates that the site was used for transient occupation. The proposed development location is on the coastal ranges west of Narrawallee Beach and overlies the Conjola formation resulting in a conglomerate and sandstone bedrock. Some clays are apparent towards the surface of an exposed ridge. The area is disturbed by human activity, particularly along the ridgeline and there is evidence of a quarry towards the south. The vegetation in the area is dominated by eucalypts and turpentine, however it has been mostly cleared. There are several natural sources of silcrete and quartzite. Most artefacts occurred in the upper layers of soil (0-40cm) and the highest density of material was located on the northern end of the spur line. There is a lack of cultural material on the slope of the spur line towards the drainage lines.

In 2005, Michael Therin, Robyn Farrell and Andrew Wellington undertook an Aboriginal Heritage survey for proposed upgrade of Croobyar Bridge near Milton. During the survey no Aboriginal sites were located, possibly due to the dense ground coverage. The site however has a high potential for sub-surface archaeology. Consequently, the entire area has been defined as a potential archaeological deposit. The study area is located either side of Croobyar Creek, west of the existing



bridge. Croobyar Creek is a major source of permanent, fresh water and contains two minor drainage lines at the south. The site is located on alluvial soil towards the south with a sandstone bedrock. It is extensively cleared with the only vegetation being pastures. There are 24 registered sites in the 5km surrounding the study area including, campsites, isolated finds and middens.

In 2005, Navin Officer Heritage Consultants Pty Ltd conducted an archaeological subsurface testing program for a proposed upgrade to a bridge at Croobyar Creek north of Milton. The study area is located on the Milton Monzonite intrusion, resulting in low, undulating slopes. There is silcrete on the coastal lowlands. Croobar Creek runs through the area, draining into the Tasman Sea. There are two minor tributaries running through the area towards Croobyar Creek. The area is dominated by native eucalypts forests and woodlands however European influence has resulted in the introduction of new species and land clearing. Previous studies of this study area showed no archaeological material however the entire area was declared as a potential archaeological deposit (PAD) due to its proximity to permanent water and archaeological sensitivity throughout the region. During this investigation a total 206 lithic items were recovered from 18 test pits in the PAD. The density of the artefacts was low for the region however there were localized concentrations of artefacts. The artefacts were predominantly composed of silcrete and quartz. The results of the testing indicate that the creek line was a focus of activity and occupation.

In 2005, Navin Officer Heritage Consultants Pty Ltd conducted an archaeological subsurface testing program for the Conjola Regional Sewerage Scheme. The study area overlies the Conjola Formation subgroup of the Shoalhaven Group. The underlying rocks consists of conglomerates and sandstone with gravel, sand and clay deposits. During the program, a total of 506 lithic items were recovered. 353 of the items were identifiable as Aboriginal artefacts and 153 were nondescript. The artefacts were predominantly composed of silcrete and quartz. The most common artefact type were flakes, lithic fragments and micro blades. Shell was recovered from a site situated on sand dunes next to the estuary. The areas that displayed the highest diversity and density in assemblages occur on coastal margins. There were also high-density assemblages at the upper reaches of Conjola Lake. While the density of the artefacts is relatively high, the ground was disturbed, particularly in the upper 15cm and was assessed as having low to moderate significance.

In 2006, South East Archaeology Pty Limited was commissioned by Elderslie Property Investments Pty Ltd to undertake an Aboriginal Heritage impact assessment in a residential development area called "Springfield Meadows" on the South Coast of NSW. In total, there were 323 stone artefacts found in the study area. The study area was divided into six sections based on environmental contexts and five showed potential to hold in situ deposits, all bordering Millards Creek. Springfield Meadows lies on the Conjola Formation and some of the Milton Monzonite. The area is in undulating, coastal lowlands with the northern boundaries containing a ridge crest. The underlying geology is composed of conglomerate and sandstones with silcrete

boulders occurring throughout the study area. The area is extensively cleared of vegetation; however, grasses and sporadic regrowth of native species occur towards the south. Previous studies surrounding Springfield Meadows indicate that scarred trees, rock shelters with deposits, carved trees and a quarry were among the most common sites, with the nearest being a scarred tree 200m northwest. Predictive models indicate that artefact scatters are the most common assemblage found in the study area and ceremonial sites, carved or scarred trees, grinding grooves, quarries, middens, occupational deposits and stone arrangements will be unlikely due to topography, distance from natural sources, and various environmental factors. The deposits were predominantly composed of silcrete with some quartzite, quartz, rhyolite, basalt or chert. The artefacts consist primarily of flakes and cores with some lithic fragments, hammerstones and retouched pieces. The artefact scatters were bordering Millards Creek and the only locations assessed as having potential in situ deposits are the hill slopes surrounding Millards Creek. There are also potential low-density assemblages further inland, however due to the distance from Millards Creek, the deposits are more likely to be disturbed with low archaeological value.

In 2006, an archaeological salvage was conducted for the Conjola Regional Sewerage Scheme, during which, a total of 900 stone artefacts were recovered from eight sites. The assemblages were composed of locally sourced silcrete with evidence of manufacture present at almost all sites. Some sites, with smaller assemblages didn't show evidence of hammerstones or cores, which were used to indicate on-site reduction in the larger assemblages. The study area overlies conglomerate and sandstones bedrock from the Conjola Formation. Seven of the salvage locations are near the coast on the elevated headlands, slopes and estuaries from small creeks. The remaining five are on the western estuarine shores of Conjola lake at elevated areas. The largest assemblage in the salvage was recovered from the western margin of Lake Conjola where 315 artefacts were found including elongated flakes, backed artefacts and retouched flakes. The salvage represents a higher than average density of artefacts compared to previous studies in the region.

3.4 Registered AHIMS Sites

A search of the Aboriginal Heritage Information Database was completed on the 24th of September 2020 for a 3km radius around the study area. The search returned 99 recorded Aboriginal sites (refer to Table 3). Figure 11 shows the sites plotted on a map in relation to the study area.

Site ID	Site name	Site features	Site types
58-1-0343	Burrill lake site 29	Shell, Artefact	Midden
58-1-0345	Burrill lake site 31	Artefact	Open Camp Site
58-1-0346	Burrill lake site 32	Shell, Artefact	Midden
58-1-0347	Burrill lake site 33	Artefact	Shelter with Deposit

58-1-0348	Burrill lake site 34	Shell, Artefact	Midden
58-1-0349	Burrill lake site 35	Shell, Artefact	Midden
58-1-0350	Burrill lake site 36	Shell, Artefact	Midden
58-1-0351	Burrill lake site 37	Shell, Artefact	Midden
58-1-0031	Milton;	Modified Tree (Carved or Scarred)	Carved Tree
58-1-0352	Burrill lake site 40	Shell, Artefact	Midden
58-1-0353	Burrill lake site 38	Shell, Artefact	Midden
58-1-0354	Burrill lake site 39	Shell, Artefact	Midden
58-1-0355	Burrill lake site 41	Shell, Artefact	Midden
58-1-0356	Burrill lake site 42	Shell, Artefact	Midden
58-1-0357	Burrill lake site 43	Artefact, Shell	Midden
58-1-0358	Burrill lake site 44	Shell, Artefact	Midden, Open Camp Site
58-1-0359	Burrill lake site 45	Shell, Artefact	Midden
58-1-0361	Burrill lake site 48	Shell, Artefact	Midden
58-1-0362	Burrill lake site 47	Shell, Artefact	Midden
58-1-0364	Burrill lake site 58	Shell, Artefact	Midden
58-1-0365	Burrill lake site 59	Shell, Artefact	Midden
58-1-0366	Burrill lake site 60	Shell, Artefact	Midden
58-1-0367	Burrill lake site 64	Shell, Artefact	Midden
58-1-0368	Burrill lake isolated find I	Artefact	Isolated Find
58-1-0369	Burrill lake isolated find_J	Artefact	Isolated Find
58-1-0712	MUB1	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0713	MUB2	Artefact	Open Camp Site
58-1-0282	Burrill lake Site 51	Shell, Artefact	Midden
58-1-0283	Burrill lake site 52	Shell, Artefact	Midden
58-1-0285	Burrill lake site 54	Shell, Artefact	Midden
58-1-0286	Burrill lake site 55	Shell, Artefact	Midden
58-1-0287	Burrill lake site 57	Shell, Artefact	Midden
58-1-0709	MUB3	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0293	Burrill lake site 61	Shell, Artefact	Midden
58-1-0298	Burrill lake site 56	Shell, Artefact	Midden
58-1-0299	None Specified	Artefact	Open Camp Site
58-1-0635	Site 3;	Artefact	Open Camp Site
58-1-0638	Site 4;	Artefact	Open Camp Site

58-1-0639	Site 5;	Artefact	Open Camp Site
58-1-0642	Burrill L. Shelter 4;	Artefact	Shelter with Deposit
58-1-0643	Racecourse Creek 2;	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0644	Racecourse Creek 1;	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0078	Bannisters Point;Mollymook;	Stone Quarry, Artefact	Quarry
58-1-0026	Narrawalle Inlet;Conjola Beach;	Shell, Artefact	Midden
58-1-0027	Conjola Beach;	Shell, Artefact	Midden
58-1-0830	CS1	Artefact	
58-1-0831	CS2	Artefact	
58-1-0929	MUPHST	Modified Tree (Carved or Scarred) : 1	
58-1-0934	NW3 - Isolated Find	Potential Archaeological Deposit (PAD) : 0	
58-1-0935	NW5 (PADNW1)	Potential Archaeological Deposit (PAD), Artefact : 129	
58-1-0641	IF 2;	Artefact	Isolated Find
58-1-0363	Burrill lake site 49	Shell, Artefact	Midden
58-1-0727	Blocks 6 & 7	Artefact	Open Camp Site
58-1-0728	Narrawallee	Artefact	Open Camp Site
58-1-0932	NW3	Artefact : 1	
58-1-0930	NW1	Artefact : 7	
58-1-0931	NW2	Artefact : 1	
58-1-0968	PAD Croobyar Creek CCPHS	Potential Archaeological Deposit (PAD) : 1	
58-1-0969	PAD Croobyar Creek CCPHN	Potential Archaeological Deposit (PAD) : 1	
58-1-0958	CS22 - Lake Conjola Entrance Road 2	Modified Tree (Carved or Scarred) : 1	

58-1-0959	PAD3 (Conjola Sewerage Scheme)	Potential Archaeological Deposit (PAD) : 1	
58-1-0960	CS26 - Conjola Sewerage 26 and PAD5	Potential Archaeological Deposit (PAD) : 1, Artefact : 1	
58-1-0961	CS21 - Lake Conjola Entrance Road 1	Modified Tree (Carved or Scarred) : 1	
58-1-0963	CS23 Lake Conjola Isolated Find 4	Artefact : 1	
58-1-0964	NW4 (Narrawallee 4)	Artefact : 15	
58-1-1019	Springfield 3 (S3)	Artefact : 268	
58-1-0284	Burrill lake site 53	Shell, Artefact	Midden
58-1-0290	Burrill lake isolated find K	Artefact	Isolated Find
58-1-1041	Matron Porter Drive AS1	Artefact : 1	
58-1-1094	Garrad Reserve 1	Shell	
58-1-0719	Pattimores 1	Artefact	Open Camp Site
58-1-0720	MP1	Artefact	Open Camp Site
58-1-0721	LC IF2	Artefact	Isolated Find
58-1-0722	LC IF1	Artefact	Isolated Find
58-1-0723	Ulladulla STP 1	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0724	Ulladulla STP 2	Shell, Artefact	Midden, Open Camp Site
58-1-0725	Ulladulla STP 3	Modified Tree (Carved or Scarred)	Scarred Tree
58-1-0726	Ulladulla STP 4	Artefact	Open Camp Site
58-1-0718	Ulladulla Site	Artefact	Open Camp Site
58-1-0717	MUB4	Artefact	Open Camp Site
58-1-0729	GD1	Modified Tree (Carved or Scarred)	
58-1-0730	Conjola Spur 1	Artefact	
58-1-0822	MU1	Artefact	
58-1-0823	BANNISTERS POINT MIDDEN	Artefact	
58-1-0824	MU IF2	Artefact	

58-1-1006	Burril Lake Site 46	Shell	
58-1-1007	Springfield 1 (S1)	Artefact : 1, Shell : 1	
58-1-1008	Springfield 2 (S2)	Artefact : 1, Shell : 1	
58-1-1009	Sprinfield 3 (S3)	Artefact : 1, Shell : 1	
58-1-1010	Springfield 4 (S4)	Artefact : 1, Shell : 1	
58-1-1011	Springfield 5 (S5)	Artefact : 1, Shell : 1	
58-1-1012	Springfield 6 (S6)	Artefact : 1, Shell : 1	
58-1-1025	USP-OS-2 (formerly PAD 1 Ulladulla Sports Park)	Potential Archaeological Deposit (PAD) : 1, Artefact : 19	
58-1-1026	USP-IF-1	Artefact : 1, Potential Archaeological Deposit (PAD)	
58-1-1027	USP-OS-1	Artefact : 2, Potential Archaeological Deposit (PAD)	
58-1-1055	Narrawallee Creek Inlet	Artefact	
58-1-1056	Narrawallee Southern Reserve	Artefact	
58-1-1057	Narawallee Southern Reserve 1	Artefact	
58-1-1095	Matron Porter Drive AS	Artefact	

Table 3: Registered AHIMS sites recorded within 3km radius of the study area.



Figure 11: AHIMS sites plotted on a map showing the distributions in 3km radius around the study area (green). Source Sixmaps © Department Finance, Services and Innovation.

3.4.1 Discussion

A review of the results of previous studies undertaken within the locality and the registered sites on the AHIMS database suggests that sites may be found anywhere across the landscape. Sites may occur anywhere across the locality and are most likely to be middens close to the major waterways and coastline, or open sites consisting of artefact scatters, isolated artefacts and PADs along creeks, ridges, and lowland areas. There is also potential for scarred trees. All sites within the search area are recorded as open sites. There are no closed sites, or ceremonial sites recorded within the search area.

3.5 Predictive Model

The assessment of the archaeological potential of the site is based upon the assessment of the landscape and landform features, assessment of the environment aspects of the site including potential resource areas (Owen and Cowie 2017), the degree of the disturbance of the landscape, proximity to freshwater, and the review of the AHIMS site data and previous reports undertaken within the locality. It will be further informed by the consultation with Aboriginal knowledge holders.

3.5.1 Topography and proximity to water

The study area is located on gently sloping ground to the west on the side of a low ridgeline. A non-perennial first order stream passes along the western margin of Lot 200. The nearest higher order stream is Pettys Creek approximately 660 metres from the study area, and 900 metres from the proposed development footprint.

Figure 12 shows the streams present in the vicinity of the study area.



Figure 12: Creeks shown within and around the study area. Streams data accessed from Spatial Services NSW. Source Sixmaps © Department Finance, Services and Innovation.

3.5.2 Economic Zones

A review of the spatial data, geology, soils and vegetation for the study area suggests that the area would have been an area of high bio-diversity, and is likely to have been an important economic zone (Boot 2002, Owen and Cowie 2017).

3.5.3 Scarred Trees

There is potential for scarred trees to be present within the locality however, by 1959 the study area had been completely cleared of all trees and vegetation (refer to Figure 8) which would have removed any scarred trees if they were present.

3.5.4 Rock Shelters

There are no rock shelters within the study area or in this part of the coastal lowlands and no shelters that have formed within the Milton Monzonite. All of the sites recorded within the search radius are open sites.

3.5.5 Grinding Grooves

Grinding grooves will normally be associated with the softer sandstone bedrock which is more suitable for producing ground edges on the harder edges of stone tools. For example grinding grooves are located on the sandstone platforms near Lake Conjola. There are no grinding grooves recorded on the Milton Monzonite.

3.5.6 Stone Raw Material Quarries and Source Locations

There are no known raw material sources or quarries within the study area. However studies undertaken within the locality have identified local sources of raw material including chert, silcrete and volcanic materials (Boot 2002, South East Archaeology 2006). Eighteen hatchets heads recovered from the Murramarang Point were composed of raw material sourced Milton (Boot 2002:341).

3.5.7 Ceremonial Grounds

There are no known ceremonial grounds at the site. The majority of the landscape surface at the site has been subject to modification for development and/or from earlier land clearing for grazing. There is unlikely to be visible remains of ceremonial structures (e.g. Bora Rings) at the site. Boot's (2002:293-324) research of sacred and ceremonial places of the hinterland considered ethnographic accounts, and earlier research, and found that there was a preference for ceremonial places in elevated areas, such as in the mountains of the hinterland, or elevated areas within a locality, though this was not exclusive. He also referred to nineteenth century ethnographic accounts of large gatherings for ceremonies that occurred on the alluvial terraces in the significant valleys and along the main rivers of the South Coast. The presence of this site type may be further informed by the Aboriginal traditional knowledge holders for the study area.

3.5.8 Burial

Most known burial sites recorded on the South Coast occur on the coast and shores of the inlets, including in the sand dunes, middens and within rock shelters (Megaw 1968, Lampert 1971, Haglund 1977, Hope 2006, Boot 2002).

3.5.9 Predictive Model Summary

Based upon the landscape topography, proximity to water, geology, environment, and the results of previous studies from the locality, the prediction for the site is for sites that include isolated or low density artefact concentrations. The study area is not associated with the landscape features that have been found to include higher concentrations of Aboriginal objects including river terraces in major valleys, broad ridgetop locations associated with water sources, or coastal areas associated with



fresh water sources. The study area is within an area that would have been an area of high biodiversity, however it is on gently sloping terrain and is not considered likely to have been camp or occupation site subject to repeated visitation. The presence of Aboriginal objects are more likely to have been associated with people moving through the landscape, using the low ridge as a travelling route between the coast and hinterland, and with procurement of resources in the area which is likely to have been a biodiverse environment.

3.6 Archaeological Survey

A pedestrian archaeological survey was undertaken at the study area on the 27th of October 2020. The survey was conducted with Lee Carriage representing the Ulladulla Local Area Land Council. The aims of the survey were to:

- Complete the survey in accordance with the requirements of Sections 2.2, 2.4, 2.5, 2.6, and 2.7 in the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH 2011).
- Determine if there are any significant landforms within the study area that indicate the likely presence of Aboriginal objects.
- Identify any Aboriginal objects present on the surface of the study area.
- Determine if any landforms of the survey area are likely to retain extant soil profiles that may contain Aboriginal objects and if there is a need to undertake archaeological test excavation.

Figure 13 shows the area covered by the pedestrian survey of the study area.



Figure 13: Pedestrian survey area shown in yellow hatching.

3.7 Survey Results

No Aboriginal sites or objects were found during the pedestrian survey and visual inspection of the ground surface. The ground surface of the site has been subjected to significant modification associated with the original construction of the school. This includes the forming of playing fields, parking areas and vehicle access, and the creation of level areas for building slabs. Two locations within the study area were considered likely to retain some intact natural soil profiles. Both areas were observed to have retained some of the natural profile of the original slope. One location is at the south of Lot 200 where the original agricultural plots are located. Whilst there is evidence of the surface having been disturbed from the agricultural activity, there is potential for the lower portion of the A horizon to be intact, and to retain cultural bearing deposit. The location is not within the development footprint. The second location is a small area south of the former preschool. This location is within the development footprint.



Figure 14: Locations within the study area with extant soil profiles.

3.8 Analysis and discussion

The study area is located away from major water sources. The study area is associated with a first order landscape with one minor intermittent first order watercourse on the west margin of Lot 200. The study area is also located close to the crest of the low ridge system that passes from Mollmook through to the high ridges of the hinterland in the Morton National Park. The ridge crest is considered to be a landscape feature likely to indicate the presence of Aboriginal objects. It is likely to have been a travelling route between the coast and mountains and is also in an area that would have been a high biodiversity rainforest and an important resource area.

With the exception of the two locations identified in Figure 14, soils at the study area have been subjected to significant disturbance as a result of historical land clearance, and the construction of the school. Figure 15 to Figure 18 shows hill-shade images derived from digital elevation models showing the extent of surface modification across the site as a result of previous development at the location. Minor spade tests were carried out within the development footprint to determine the presence of any surviving natural soils.

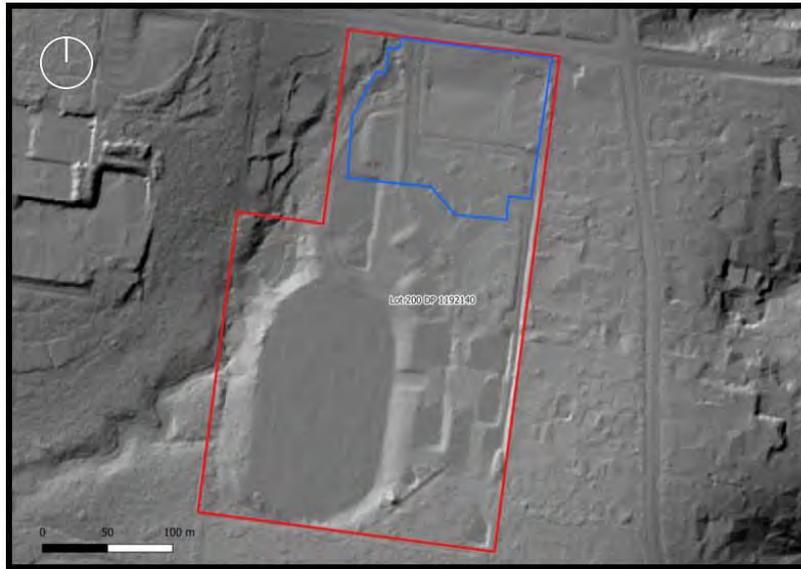


Figure 15: Hillshade image of the study area showing the extent of surface modification that has occurred at the site. The blue polygon represents the approximate area of the development footprint. Image derived from DEM © Department Finance, Services and Innovation.

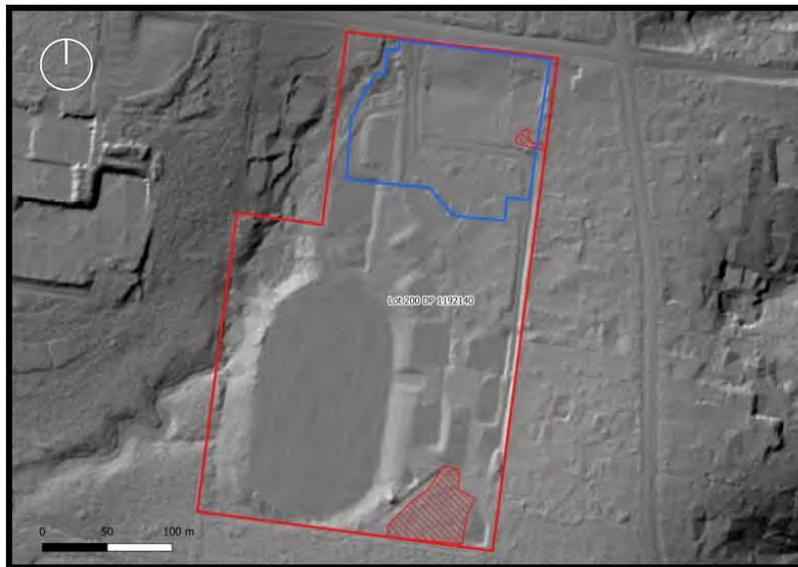


Figure 16: Hillshade image of the study area showing the extent of surface modification and the red hatched areas representing the location of potential surviving soil profiles. Image derived from DEM © Department Finance, Services and Innovation.

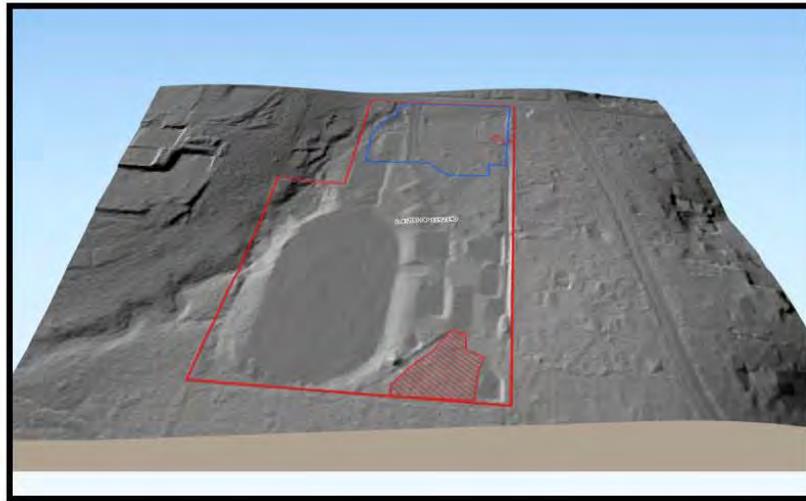


Figure 17: 3D view looking north across the study area showing the two areas with potential surviving soil profiles (red hatched areas). Image derived from DEM © Department Finance, Services and Innovation.

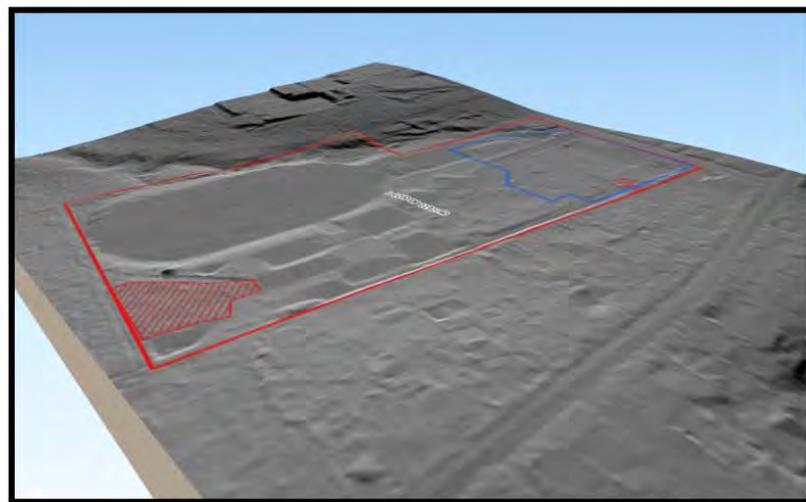


Figure 18: 3D view looking west across the study area showing the two areas with potential surviving soil profiles. Image derived from DEM © Department Finance, Services and Innovation.

When considering the soil disturbance categories used by the National Committee on Soil and Terrain as shown in Table 4, the areas of Lot 200 that are within the development footprint, with the exception of the identified area in Figure 14, would fall into the 8th category as being highly disturbed due to urban development impacts. The identified area would be considered category 5.

The majority of the proposed development footprint, with the exception of the identified area, would be considered as disturbed land in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales 2010*.

	SITE DISTURBANCE CATEGORY
0	No effective disturbance; natural
1	No effective disturbance other than grazing by hoofed animals
2	Limited clearing (e.g. selective logging)
3	Extensive clearing (e.g. poisoning, ringbarking)
4	Complete clearing; pasture, native or improved, but never cultivated
5	Complete clearing; pasture, native or improved, cultivated at some stage
6	Cultivation; rainfed
7	Cultivation; irrigated, past or present
8	Highly disturbed (e.g. quarrying, road works, mining, landfill, urban)

Table 4: Categories of Soil Disturbance (National Committee on Soil and Terrain 2009).

3.9 Test Excavation

A test pit excavation program was undertaken on the 3rd of December 2020 in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (2010) and the project archaeological investigation methodology. The excavation team included Tocomwall management and staff including Sam Franks, Robert Lester, and archaeologists Danielle Mitchell and Will Moon. Registered Aboriginal Party participants included Lee Carriage from the Ulladulla Local Area Land Council and Peter Markovic from the Wreck Bay Community.

3.9.1 Sampling Strategy

The test excavation sampling strategy was undertaken in accordance with the test excavation methodology described in the Aboriginal Cultural Heritage Assessment methodology version 1.0. This strategy is described as follows:

The proposed methodology is to undertake a series of test pit excavations at the study area that sample the landscape feature. Test pits will be completed

as 50cm x 50cm squares and will be spaced at 6 metres intervals. Figure 19 shows the location of the test pits. Test pits have been oriented in order to sample the entire area that contains potential extant soil profiles. Excavated material was wet sieved through a 5mm mesh. Test excavations were carried out in accordance with requirement 16a of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW.



Figure 19: Test pit locations.

3.10 Artefacts

Two artefacts were identified during the test excavation program. In order to understand the artefacts described in this report, the following terminology and descriptions are provided to assist with the interpretation of the results provided in this report.

3.10.1 Artefact typology

Artefact typology is normally described according to the artefact form, manufacturing systems which creates variation within the artefact form, and artefact use. Types include flakes, cores, hammerstones, grindstones, ground-edge hatchet heads and anvils. Artefacts may be further described according to their degree of reduction, and may be described as ‘tools’ according to evidence of usewear on the edges, and retouch of the edges (modification of the edges using pressure flaking) to



create a specific form. Types include backed artefacts, blades, scrapers, adzes, points, notched tools and core tools or nuclear tools.

3.10.2 Reduction

Lithic reduction is the process of the removal of raw material to obtain the required form of an artefact. Raw materials often begin with a natural (or cortex) surface. From this natural state, flakes may be struck and removed, or pieces may be removed for use as smaller transportable cores for later use for the extraction of flakes. River cobbles and pebbles with a cortex surface are also used as cores and maybe small enough to transport to knapping sites where flakes are removed, or flakes may be struck from small cores during transit of an as needs basis. The degree of reduction and the extent of remaining cortex can be use inform research into behavioural patterns and the movement of resources within the landscape.

3.10.3 Raw Materials

Raw materials used for the manufacture of artefacts were chosen because of the properties that they possess including the properties they exhibit during knapping that enables the desired form of the artefact to be obtained, and the ability of the raw material to produce and maintain the desired properties such as edge toughness and sharpness. Some raw material types may be subjected to heat treatment in order to modify the crystalline structure of the material to improve its fracture and toughness properties. Raw materials may be available locally, or they may be traded and/or transported to a site from distant locations.

3.10.4 Artefact features

Artefacts will be described according to their diagnostic features. Figure 20 to Figure 22 show diagnostic attributes of artefacts used to describe them. Platform surfaces will be recorded according to their type, including: natural, flake scar, abraded, or crushed. The termination is the shape of the distal end of the flake caused by the way the fracture crack and associated percussive forces leave the core. Where the end of the flake tapers off with a minimum acute angle, this is called a feather termination. A hinge termination occurs when the fracture exits at an approximate right angle to the longitudinal axis of the flake. Step terminations are when the crack terminates abruptly at right angles to the longitudinal axis of the flake, creating a small step. For Plunge terminations the fracture penetrates deeper into the core eventually exiting with the base of the core included in the flake. Axial terminations are caused when the fracture crack continues right through the core exiting at the bottom of the core (Holdaway and Stern 2004:129-130).

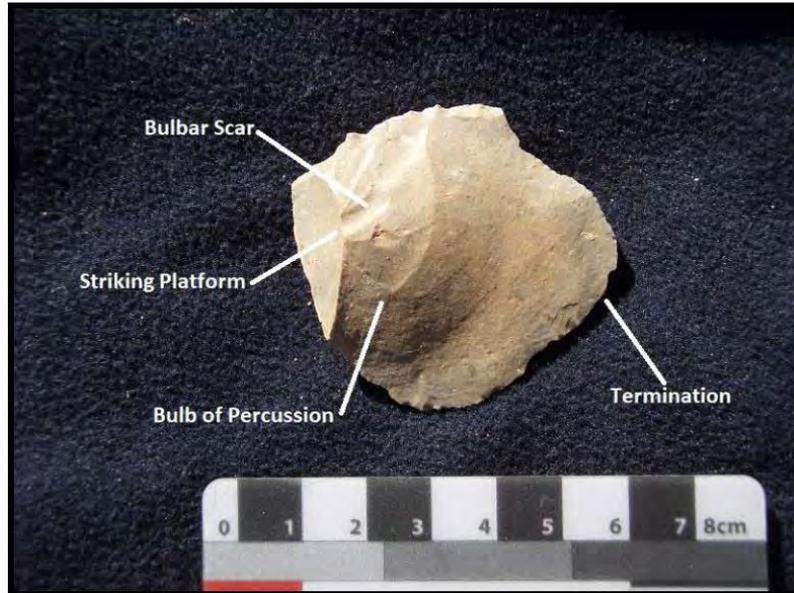


Figure 20: Ventral surface of a flake artefact showing diagnostic features.

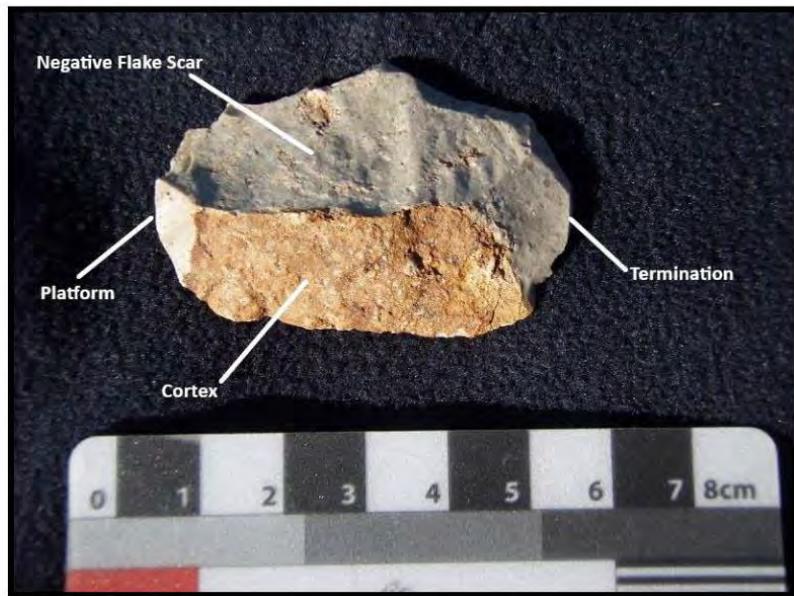


Figure 21: Dorsal surface of a flake artefact showing diagnostic features.



Figure 22: Core showing diagnostic features.

Flake artefacts may be broken. Breaks occur either longitudinally or transversely, or a combination of the two. Figure 23 shows a diagram of the breakage types used to describe broken artefacts.

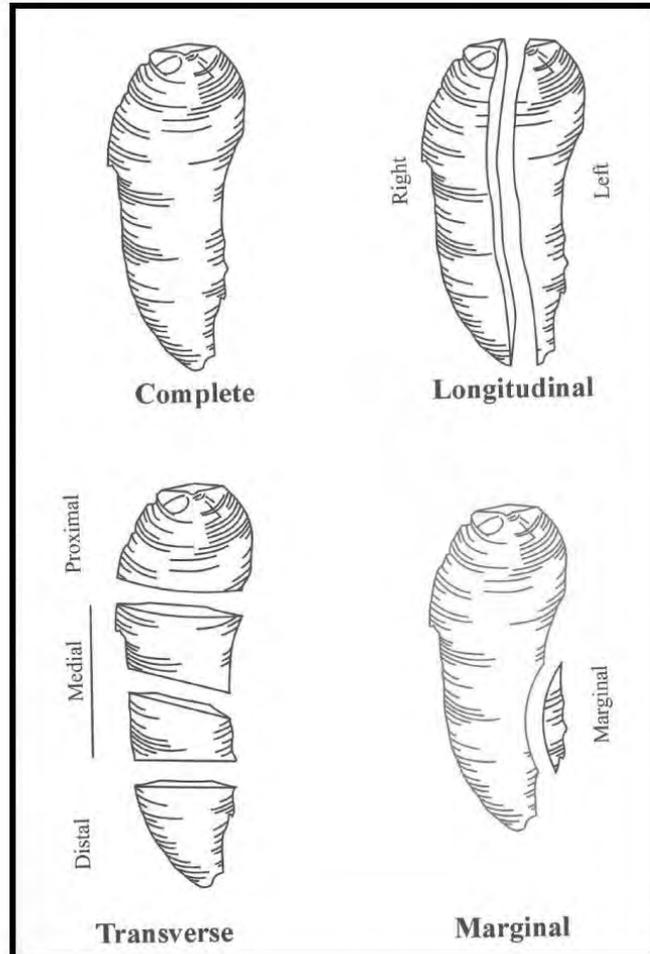


Figure 23: Diagram of breakage types used to describe broken flake artefacts (Hiscock 2002).

4 Test Excavation Results

Five test pits on Lot 200 were completed in accordance with the methodology. Test pit excavation continued down to the sterile B Horizon, clay layer. No stratigraphy was evident in the A Horizon above the clay (B Horizon). Excavated material was wet sieved through a 5mm aperture mesh. Two Aboriginal objects were located during the excavation and sieving. Excavation recording forms were used to record the details for

each spit excavated. Both pits A01 and A05 were excavated in 5cm spits. Pits A02, A03 and A04 were excavated in 10cm spits. Each spit was also photographed.





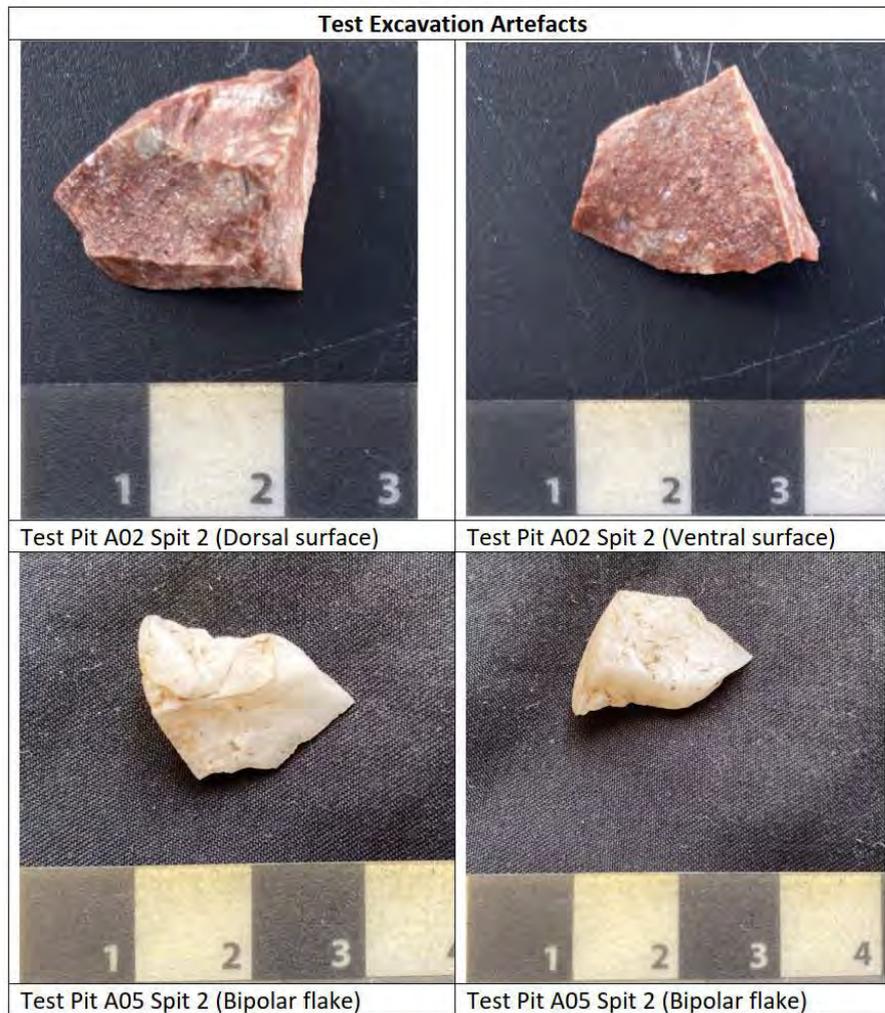
Table 5: Completed Test Pits

Test Pit Number	Transect	No. Spits	Interval	Depth	Description
A01	1	4	5cm	20cm	A Horizon: Dark brown sandy/silty loam. No stratification observed in A Horizon. Excavation terminated at the sterile B (Clay) Horizon.
A02	1	2	10cm	20cm	A Horizon: Dark brown sandy/silty loam. No stratification observed in A Horizon. Excavation terminated at the sterile B (Clay) Horizon.
A03	1	3	10cm	27cm	A Horizon: Dark brown sandy/silty loam. No stratification observed in A Horizon. Excavation terminated at the sterile B (Clay) Horizon.
A04	1	3	10cm	30cm	A Horizon: Dark brown sandy/silty loam. No stratification observed in A Horizon. Excavation terminated at the sterile B (Clay) Horizon.
A05	2	4	5cm	≥20cm	A Horizon: Dark brown sandy/silty loam. No stratification observed in A Horizon. Excavation terminated at fragile fragmented orange rock.

Table 6: Table showing spit number and depth for each test pit.

4.1 Test excavation artefacts

Two lithic artefacts were identified during the test excavation. One artefact identified from Test Pit A02 Spit 2 was a broken flake consisting of a medial piece of silcrete. Two negative flake scars are present on the dorsal surface. A second artefact identified from Test Pit A05 Spit 2 is a flake derived from a quartz pebble using the bipolar reduction technique. The flake retains a pebble cortex platform.



The artefact raw materials are consistent with the raw material types found in other archaeological studies within the area. Due to the low artefact numbers it is not possible to undertake any meaningful analysis.

Spit	Artefact Count				
	Pit No. A01	Pit No. A02	Pit No. A03	Pit No. A04	Pit No. A05
1	0	0	0	0	0
2	0	1	0	0	1
3	0		0	0	0
4	0				0

Table 7: Showing artefacts identified per spit and pit.

4.2 Considering ridgeline use in the lowland areas of Milton.

The test excavation sampled a small area of intact soil profile located on a landform that is gently sloping to the west. It is near the crest of a low ridge which is the present location of the Princess Highway. Ridge crests and ridgelines are identified as significant landscape features that are likely to indicate the presence of Aboriginal objects within the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales 2010*. In the mountain and hinterland areas, ridgelines were likely to have been the most efficient way to travel between places. Boot's (2002:16-17) review of the work of Sullivan (1983:79-82), Byrne (1981, 1983, 1984), Hughes, et al (1982) and Lewis (1983) found that ridges were important travel routes between places and were indicators of site clustering in level areas. Ridgetops are often gently undulating and travel along ridges in the hinterland enabled the deep gorges and gullies, and the difficult and steep terrain that needed to be traversed in and out of the valleys and gullies to be avoided. Transit routes would be concentrated on the ridgetops and ridgelines. However in the lowland areas adjacent to the coast, including the area around Milton, the terrain is low ridges, or hills 50 to 100 metres in elevation, and more gently undulating with depressions and broad shallow valleys associated with the creek-lines. The easiest travel-ways through the terrain is not necessarily on the ridgelines. To demonstrate that the low ridges may not have offered the most efficient way of moving through the country, the R statistical program was used to plot a number of locations around Milton, and from a central point to the south of the study area on the ridgetop, the least-cost

path across the landscape was calculated using Hertzog's (2013, Alberti 2019) metabolic cost function over an elevation model.

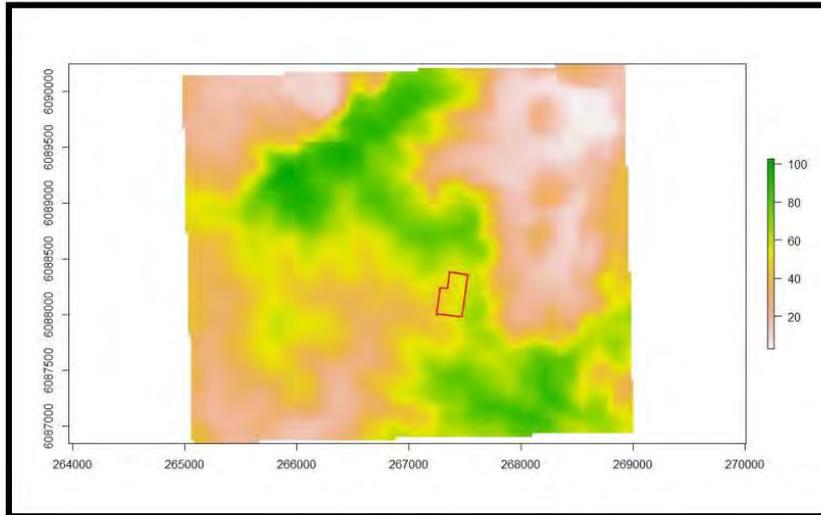


Figure 24: Image of a digital elevation model with the study area shown in red. Elevation heights are shown in the colour bar on the right. SRTM-derived 1 Second Digital Elevation Models Version 1.0 Source Commonwealth of Australia (Geoscience Australia).

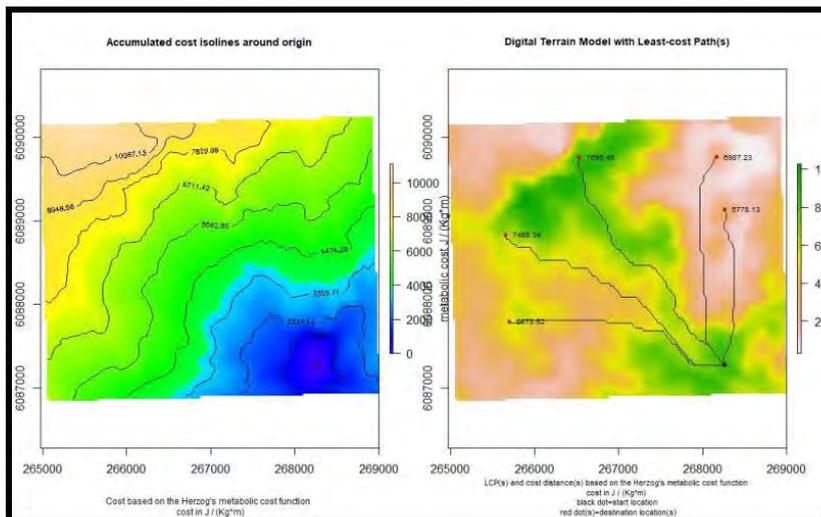


Figure 25: Image showing the leastcost paths calculated from the central point on the ridgetop at the lower right of the screen out to random points projected around Milton.

Figure 24 shows the study area plotted over a digital elevation model (DEM). Figure 25 shows the same DEM in the right hand image showing the paths of least cost to random sites around Milton. In all cases the calculated route of least cost did not stay on the ridge crest, and only one path followed the ridge. Similar results were achieved using Pandolf et al.'s (1977, Alberti 2019) metabolic energy expenditure cost function, and Van Leusen's (2002, Alberti 2019) metabolic energy expenditure cost function. The low ridge crest in this environment is unlikely to have been a site of concentrated use for travelling through the country as would have been the case on the higher more major ridgelines further inland. Figure 26 shows the results of Van Leusen's metabolic energy expenditure cost function when destination points are lined up along the high points on the ridge at Milton. The leastcost path is often the most direct route, rather than the ridgeline.

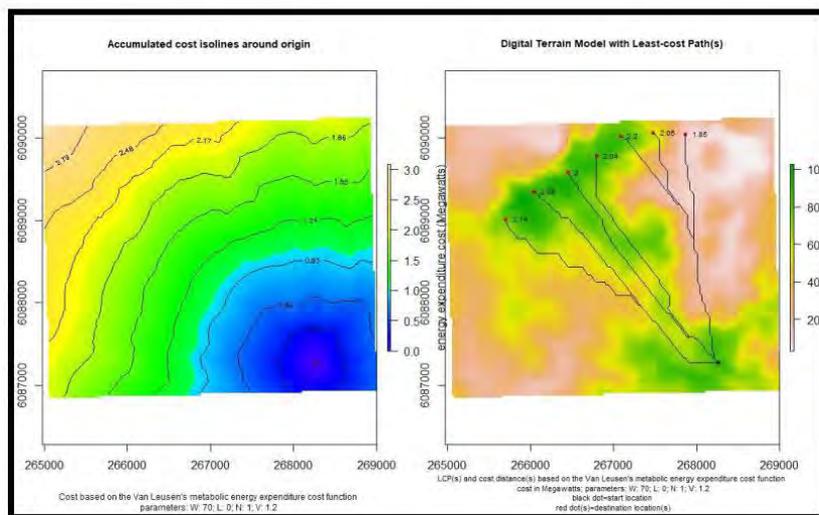


Figure 26: Image showing the leastcost paths calculated using Van Leusen's metabolic energy expenditure cost function from the central point on the ridgetop at the lower right of the screen out to random points projected onto the ridge crest at Milton.

4.3 Discussion

The results of the test excavation suggest that a disperse low density distribution of artefacts occurs across the subject landform. The low number of artefacts identified has meant that meaningful analysis is not possible. The resulting low number of artefacts align with the present understanding of the archaeology of the South Coast, lowlands and hinterland including that artefact distributions and sites may be found

anywhere within the landscape but will generally be small and consist of low numbers of artefacts if they are not associated with significant landscape features such as broad open ridges with adjacent water sources, and flat areas closely associated with woodlands and major river valleys. The low number of artefacts also aligns with the least cost models which suggests the ridge crest near the test excavation site was not necessarily the optimal path for traversing the terrain in this area. The direct route between locations was also often the most energy efficient route meaning that travelling through country around Milton may have been more disperse rather than concentrated on a specific landscape feature such as the ridgeline. The test excavation results may be a reflection of this pattern of landscape use.

Clive Freeman from the Wreck Bay Community responded to the methodology review with the following information: *"This location is above an old campsite our family would visit. We have very strong connections to this area. The view to both Dithol and Bhewerre are of great significance. This Area holds a lot of stories connected to our family and the hills leading to the stringy bark forests were taught to us family to make the nets for king fish and bark canoes."* This response indicates that there is a campsite nearby that was subjected to repeated visitation. It also emphasises the significance of the view from the subject area to places of great significance. The expectation is that there are areas within the study area, now destroyed from the earlier development of the school, that would have retained cultural material associated with use and occupation of the area. The small sample from the remaining intact soil profile with the study area is unable to provide an adequate representation of the original archaeology of the subject area.

5 Scientific values and significance assessment

The Australian ICOMOS Burra Charter defines the processes of assessing significance of items for cultural heritage value. Archaeological sites are assessed for significant according to; scientific or archaeological significance, cultural significance, representative significance including how much variability (outside and/or inside the subject area) exists, what is already conserved, how much connectivity exists, and value as an educational resource. In New South Wales, the nature of significance relates to the scientific, cultural, representative or educational criteria and sites are also assessed on whether they exhibit historic or cultural connections.

5.1 Archaeological significance

5.1.1 Scientific Significance

The Australia ICOMOS Burra Charter 1999 describes scientific significance as follows: *'The scientific value of any given location will depend on the importance of the data that can be obtained from any archaeological material located, on its rarity, quality and on the degree to which this may contribute further substantial information to a scientific research process.'*



The study area is considered to be of low scientific significance. The test excavation has provided very little data. The raw material of the identified artefacts is common to the locality. One artefact is a quartz flake produced by bipolar reduction, a process commonly used for the production of quartz flakes. The other flake is a broken flake which retains minimal features that could contribute to any meaningful analysis.

There is no visible evidence that the flakes have been used. To determine if they had been used, microscopic edge wear analysis would need to be undertaken however due to the small number of artefacts it would not provide sufficient data to contribute to the scientific significance of the archaeology nor would it provide substantial information to the scientific research process. No datable material was found in association with the artefacts, so it is not possible to place the artefacts into an age context. The study area is considered to be of low scientific significance.

5.1.2 Educational Significance

The Australia ICOMOS Burra Charter 1999 describes educational significance: *'The educational value of any given location will depend on the importance of any archaeological material located, on its rarity, quality and the contribution this material can have on any educational process.'*

The study area is considered to be of low educational significance. The test excavation has provided very little data. The raw material of the identified artefacts are common to the locality. One artefact is a quartz flake produced by bipolar reduction, a process commonly used for the production of quartz flakes. The other flake is a broken flake which retains minimal features that could contribute to any meaningful analysis. There is no visible evidence that the flakes have been used. No datable material was found in association with the artefacts so it is not possible to place the artefacts into an age context.

The archaeology has limited educational significance. The results affirm the present understanding of the archaeology of the South Coast lowlands and hinterland including that artefact distributions and sites may be found anywhere within the landscape but will generally be small and consist of low numbers of artefacts.

5.1.3 Representative significance

The Australia ICOMOS Burra Charter 1999 describes representative significance: *'The representative value of any given location will depend on rarity and quality of any archaeological material located and on the degree to which this representativeness may contribute further substantial information to an educational or scientific research process.'*

The study area is considered to be of low representative significance. The sites recorded during the test excavation are representative of sites in the region. The raw

material and artefact types are represented at sites throughout the locality. The representativeness and the small amount of data from the test excavation program is not considered to contribute further substantial information to the education or scientific research processes.

5.2 Impact assessment

5.2.1 Assessing Harm

The proposed development includes the construction of a building block consisting of four homebases positioned in the location of the remaining intact soils profile (test excavation location) (refer to Figure 27). The other buildings are located in positions where the soil is in a disturbed context and there are no surviving soil profiles. The construction will involve earthworks associated with the building construction and the provision of services and is expected to disturb the remaining A horizon soils in the area. This will also destroy the test pit locations from which the two artefacts were identified.

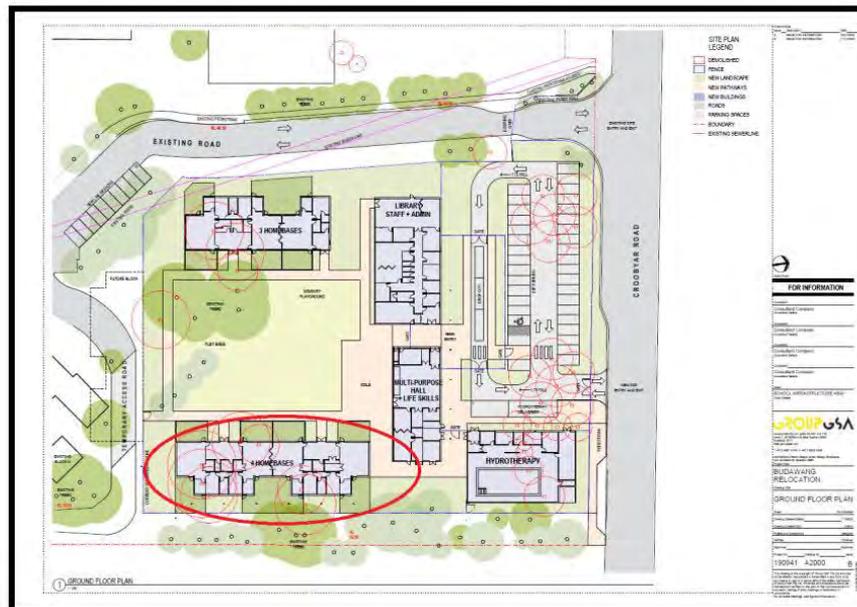


Figure 27: Red circled area where development will potentially impact upon surviving intact soil profiles.

Table 8 shows the harm that will occur to known sites. Direct harm to both artefact sites will occur as a result of the development. The remaining area of intact soil within the test excavation sample area is expected to be a continuation of a disperse

low density distribution of artefacts. This area will also be destroyed and any artefacts that may be present in this area will be directly harmed.

Site number	Location	Type of harm	Degree of harm	Consequence of harm
Pit A02	E 267505 N 6088294	Direct	Total	Total loss of value
Pit A05	E 267498 N 6088304	Direct	Total	Total loss of value

Table 8: Harm to known sites.

5.3 Management and mitigation measures

The procedures for the storage and reburial of Aboriginal objects will be determined in consultation with the registered Aboriginal stakeholders, and the Schools Infrastructure NSW if it is proposed to rebury the artefacts within the school grounds.

5.4 Recommendations

These recommendations are provided on the basis of the recognition of the legal requirements and automatic statutory protection provided to Aboriginal 'objects' and 'places' under the terms of the National Parks and Wildlife Act of 1974 (as amended), and as outlined in the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW 2010).

The recommendations are:

The sites of the identified artefacts will be destroyed by the proposed development and as such an Aboriginal Heritage Impact Permit (AHIP), or the appropriate SSD approvals will need to be in place in order for the development to proceed. This AHIP should be for known and unknown Aboriginal objects within the study area;

Archaeological test excavation has been carried out within the study area in accordance with Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010), and Part 6 National Parks and Wildlife Act 1974. This has enabled an understanding and characterisation of the disperse distribution of artefacts within the surviving soil profiles and the archaeological significance and scientific value of the identified artefacts and site, and likely value of the remaining undisturbed landform. This information should be used as the basis for the preparation of the AHIP, or assessment requirements of the SSD and SEARS;



If any unanticipated Aboriginal archaeological objects, sites or PAD are identified during the construction program within impact footprints, works should cease immediately, and notify Heritage NSW;

If any human remains are identified during the earthworks within the impact footprints works should cease immediately and the Police and NSW Heritage should be contacted;

Consultation with the registered Aboriginal stakeholders should continue, and an opportunity will be provided for their review and comment on the results and recommendations of this report. These comments will be included in the final format of this report.



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